April 24, 2012



Mr. Carl Spreng
Colorado Department of Public Health and Environment
HMWMD-HW-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3358

Email: carl.spreng@state.co.us

Re: King's One Hour Cleaners

3217 South Academy Boulevard Colorado Springs, Colorado Terracon Project No. 23107012

Dear Mr. Spreng;

On behalf of New Mission, LLC Terracon Consultants, Inc. (Terracon) is providing the results of indoor air sampling performed in general accordance with your letter dated March 26, 2012.

Between April 13 and April 14, 2012, Terracon collected air samples from the Mayo & Memphis Restaurant located at 3219 South Academy Boulevard (adjacent to the former King's One Hour Cleaners) and the Creative Kidz College day care facility located at 3225 South Academy Boulevard. The air samples were collected and analyzed in accordance with procedures listed in the September 2004 Draft Indoor Air Guidance and April 2000 Guidance for Analysis Of Indoor Air Samples (http://www.cdphe.state.co.us/hm/airsmpl.pdf) using EPA Method TO-15 SIM. The air samples were collected using Summa canisters with a 24-hour sampling period orifice. The Summa canisters were placed in routinely occupied areas of the tenant spaces at heights of approximately 4 to 5 feet above the floor.

The air samples were analyzed by Environmental Science Corporation (ESC) located in Mt. Juliet, Tennessee. The results were compared to the March 2012 Air Screening Concentrations table prepared by Colorado Department of Public Health and Environment (CDPHE). The Worker Remediation Goal was used for evaluating the results from the restaurant air samples whereas the Residential Remediation Goal was used for evaluating the results from the day care facility. Sample results for tetrachloroethene (PCE) are summarized in the table below. The laboratory's report is attached to this letter report.

Sample Location	PCE Guidance Value	PCE Result
Restaurant	47.2 μg/m ³	16 μg/m ³
Day Care Facility	9.36 μg/m ³	0.60 μg/m ³

Note: μg/m3 = micrograms per cubic meter of air

Terracon Consultants, Inc. 4172 Center Park Drive Colorado Springs, CO 80916
P [719] 597 2116 F [719] 597 2117 terracon.com

Indoor Air Sampling Results King's One Hour Cleaners ■ Colorado Springs, CO April 24, 2012 ■ Terracon Project No. 23107012



Based on these results, and in accordance with CDPHE's March 26, 2012 letter, additional analysis or action with respect to indoor air quality is not required.

Respectfully submitted, Terracon Consultants, Inc.

Dan Taylor

Environmental Project Manager
N:IPROJECTS\2010\23107012\Spreng_042412.docx

Lawrence R. Keefe Principal | Office Manager

C. Matt Craddock – New Mission, LLC
Connie H. King – Law Firm of Connie H. King, LLC



12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Larry Keefe Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Report Summary

Friday April 20, 2012

Report Number: L570131 Samples Received: 04/14/12 Client Project: 23107012

Description: Kings Dry Cleaners

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Daphne Richards , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197, FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704/BI0041, ND - R-140. NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612, NM - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1, TX - T104704245-11-3, OK - 9915, PA - 68-02979

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.

Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

This report may not be reproduced, except in full, without written approval from ESC Lab Sciences. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Larry Keefe Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

April 20, 2012

Date Received Description

April 14, 2012 Kings Dry Cleaners

Sample ID

RESTARAUNT

Collected By : Collection Date :

Larry Keffe 04/13/12 08:00

Site ID :

Project # : 23107012

ESC Sample # : L570131-01

Parameter	Cas# N	Mol Wgh	t RDL1	RDL2	ppbv	ug/m3	Method	Date	Dil.
Volatile Organics - TO-15 SIM						• • •			
Benzene	71-43-2	78.1	0.020	0.064	0.17	0.54	TO-15	04/19/12	
Carbon tetrachloride	56-23-5	154	0.020	0.13	0.074	0.47	TO-15	04/19/12	
Chloroethane	75-00-3	64.5	0.040	0.11	< 0.040	< 0.11	TO-15	04/19/12	
Chloroform	67-66-3	119	0.020	0.097	0.14	0.68	TO-15	04/19/12	
Chloromethane	74-87-3	50.5	0.030	0.062	0.46	0.95	TO-15	04/19/12	
1,2-Dibromoethane	106-93-4	188	0.020	0.15	< 0.020	< 0.15	TO-15	04/19/12	1
1,4-Dichlorobenzene	106-46-7	147	0.020	0.12	< 0.020	< 0.12	TO-15	04/19/12	
1,1-Dichloroethane	75-34-3	98	0.020	0.080	< 0.020	< 0.080	TO-15	04/19/12	1
1,1-Dichloroethene	75-35-4	96.9	0.020	0.079	< 0.020	< 0.079	TO-15	04/19/12	1
cis-1,2-Dichloroethene	156-59-2	96.9	0.020	0.079	0.22	0.87	TO-15	04/19/12	1
trans-1,2-Dichloroethene	156-60-5	96.9	0.020	0.079	< 0.020	< 0.079	TO-15	04/19/12	1
1,2-Dichloropropane	78-87-5	113	0.030	0.14	< 0.030	< 0.14	TO-15	04/19/12	1
cis-1,3-Dichloropropene	10061-01-5	111	0.020	0.091	< 0.020	< 0.091	TO-15	04/19/12	1
trans-1,3-Dichloropropene	10061-02-6	111	0.030	0.14	< 0.030	< 0.14	TO-15	04/19/12	1
Ethylbenzene	100-41-4	106	0.030	0.13	0.25	1.1	TO-15	04/19/12	1
1,1,2,2-Tetrachloroethane	79-34-5	168	0.020	0.14	< 0.020	< 0.14	TO-15	04/19/12	1
Tetrachloroethylene	127-18-4	166	0.020	0.14	2.4	16.	TO-15	04/19/12	1
1,1,1-Trichloroethane	71-55-6	133	0020	0.11	< 0.020	< 0.11	TO-15	04/19/12	1
1,1,2-Trichloroethane	79-00-5	133	0.030	0.16	< 0.030	< 0.16	TO-15	04/19/12	1
Trichloroethylene	79-01-6	131	0.020	0.11	0.058	0.31	TO-15	04/19/12	1
Vinyl chloride	75-01-4	62.5	0.020	0.051	< 0.020	< 0.051	TO-15	04/19/12	1
Vinvl acetate	108-05-4	86.1			0.061	0.21	TO-15	04/19/12	1
1,4-Bromofluorobenzene	460-00-4		-,	· · -	103.32	% Rec.	TO-15	04/19/12	1

RDL1 = ppbv , RDL2 = ug/m3
Note:

Units are based on (STP) - Standard Temperature and Pressure
The reported analytical results relate only to the sample submitted.
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Reported: 04/20/12 10:04 Printed: 04/20/12 11:26



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Est. 1970

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REPORT OF ANALYSIS

April 20, 2012

Larry Keefe Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

April

Date Received Description

14, 2012

Sample ID

DAY CARE

Collected By : Collection Date :

Larry Keffe 04/13/12 08:15

L570131-02 ESC Sample # :

Site ID :

Project # : 23107012

Parameter	Cas#	Mol Wgh	t RDL1	RDL2	- ppbv -	_ug/m3	Method	Date	_D11
Volatile Organics - TO-15 SIM									
Benzene	71-43-2	78.1		0.064	0.23	0.73	TO-15	04/20/12	
Carbon tetrachloride	56-23-5	154	0.020	0.13	0.071	0.45	TO-15	04/20/12	
Chloroethane	75-00-3	64.5	0.040	0.11	< 0.040	< 0.11	TO-15	04/20/12	
Chloroform	67-66-3	119	0.020	0.097	0.19	0.92	TO-15	04/20/12	
Chloromethane	74-87-3	50.5		0062	0.48	0.99	TO-15	04/20/12	
1,2-Dibromoethane	106-93-4	188	0.020	0.15	< 0.020	< 0.15	TO-15	04/20/12	
1,4-Dichlorobenzene	106-46-7	147	0.020	0.12	< 0.020	< 0.12	TO-15	04/20/12	
1,1-Dichloroethane	75-34-3	98	0.020	0.080	< 0.020	< 0.080	TO-15	04/20/12	
1.1-Dichloroethene	75-35-4	96.9	0.020	0.079	< 0.020	< 0.079	TO-15	04/20/12	
cis-1,2-Dichloroethene	156-59-2	96.9	0.020	0.079	0.036	0.14	TO-15	04/20/12	
trans-1,2-Dichloroethene	156-60-5	96.9	0.020	0.079	< 0.020	< 0.079	TO-15	04/20/12	
1,:2-Dichloropropane	78-87-5	113	0.030	0.14	< 0.030	<0.14	TO-15	04/20/12	
cis-1,3-Dichloropropene	10061-01-5	111	0.020	0.091	< 0.020	< 0.091	TO-15	04/20/12	
trans-1,3-Dichloropropene	10061-02-6	111	0.030	0.14	< 0.030	< 0.14	TO-15	04/20/12	
Ethylbenzene	100-41-4	106	0.030	0,13	0.14	0.61	TO-15	04/20/12	
1,1,2,2-Tetrachloroethane	79-34-5	168	0:020	0.14	< 0.020	< 0.14	TO-15	04/20/12	
Tetrachloroethylene	127-18-4	166	0:020	0.14	0.089	0.60	TO-15	04/20/12	
1,1,1-Trichloroethane	71-55-6	133	0.020	0.11	< 0.020	< 0.11	TO-15	04/20/12	
1,1,2-Trichloroethane	79-00-5	133	0.030	0.16	< 0.030	< 0.16	TO-15	04/20/12	
Trichloroethylene	79-01-6	131	0.020	0.11	< 0.020	< 0.11	TO-15	04/20/12	
Vinyl chloride	75-01-4	62.5	0.020	0.051	< 0.020	< 0.051	TO-15	04/20/12	
Vinvl acetate	108-05-4	86.1	0.020	0.070	0.074	0.26	TO-15	04/20/12	1
1,4-Bromofluorobenzene	460-00-4				109.16	% Rec.	TO-15	04/20/12	1

RDL1 = ppbv , RDL2 = ug/m3

Note: Units are based on (STP) - Standard Temperature and Pressure The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

Reported: 04/20/12 10:04 Printed: 04/20/12 11:26

Attachment A List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
·		· · · · ·	the second secon	: ======	
1 ₂ 570131-01	WG588597	SAMP	Tetrachloroethylene	R2132234	E

Attachment B Explanation of QC Qualifier Codes

Qualifier

Meaning

GTL (EPA) - Greater than upper calibration limit: Actual value is known to be greater than the upper calibration range.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods, it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

- Definitions
 Accuracy The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.
- Precision The agreement between a set of samples or between duplicate samples.

 Relates to how close together the results are and is represented by
 Relative Percent Difference.
- Surrogate Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.
- TIC Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Summary of Remarks For Samples Printed 04/20/12 at 11:26:42

TSR Signing Reports: 288 R5 - Desired TAT

run V8260TPHKS on Starkys and Rampart projects

Sample: L570131-01 Account: TERRCSCO Received: 04/14/12 09:00 Due Date: 04/20/12 00:00 RPT Date: 04/20/12 10:04

Sample: L570131-02 Account: TERRCSCO Received: 04/14/12 09:00 Due Date: 04/20/12 00:00 RPT Date: 04/20/12 10:04

		Biltin	g information	ı.			Ana	lysis/Contain	er/Preserva	tive	Chain of Custody	$\overline{}$
Terracon - Colorado	Springs	8									Page of	
4172 C			counts P		VO				A. 19			
4172 Center Park Drive		1 41	4172 Center Park Drive				12712		4	MATCO		
Colorado Springs,CO 80	916	C	olorado S	prings,CO	80916		表示		4			
						S.				L-A-B S-C-I-E-N-C-E-S		
Report to:		Ema	ait					1	E 12 16	4275	12065 Lebanon Road	
Larry Keefe				efe@terra			50 TO	建 疆。			Mc Juliet, TN 37122	
Project Description: Golf Acres Dry Change	KINGS CLEAR Client Project #:	DRY	City/State Collected	COLOR	400 SP	maj			488		Phone: (800) 767-5859 Phone: (615) 758-5858	
Phone: (719) 597-2116	Client Project #:		Lab Pr		KINGS		(本) (表)	1 1	加速		Fax: (615) 758-5859	
FAX: (719) 597-2117	231070		TER	RCSCO-G	OLE CR	ES						
Collected by (print);	Site/Facility ID#:		P.O.#:				na		100	24.4		Name of
Collected by (signature):		Lab MUST Be I		Date Resu	lts Needed					100	Acctnum: TERROSCO (lab use o	only)
				14/2	3/12		Si	E.A.			Template/Prelogin T78121/P389	114
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Packed on Ice N Y				FAX? _N		of	TO-15SIM Summa		10000		Shipped Vie: FedEX Ground	
Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Cntrs	TO	Table of the state			Remarks/Contaminant Sample # (lat	b only)
RESTARANT	G	Air		4/13/12	08:00	1	X	表势力	遊園	4.3	#365m L570131-9	
DAYCARE	G	Air		4/13/12	08:15	1	X	2 m		18.1	4455,m -al	
							1	100				
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<u> </u>								16.00				
					<u></u>		23	開		145		
"Matrix: SS - Soil GW - Groundwater WW	-WasteWater D	W - Drinking Wate	er OT - Other	AIR						pH	Temp	_
HAG - INTHE PRE	issum: -2	5 FIN	ac: -4	_				_			Other	_
#45 - INITIAL PRE	SSIRE: D	5_ Fin	w. q	2	m	N.	D.L.	- FUR	PCR 4-1 -	erg (m³		
Relinquished by (Signature)	Date	Time:		red by: (Signat	ure)		_	Sam	ples returned	via: UPS	Condition: (lab use or	ily)
Relinquished by (Signature) HIS/12 10:15 FedE) Received by: (Signature) Received by: (Signature) Tergo:									15			
Relinquished by (Signature)	Date:	Time:	Kecen	red by. (Signal	MIC)			A	into	Bottles Receive	COC Seal Intact: Y N	NA
Relinquished by: (Signature)	Date:	Time:	40000 A 60000	d for lab by: (S	2015/97/2010/09/2010/2010	1.75% - 2.38C1108		Date	1/2	Time:	pH Checked: NCF:	
			14	n le	roce	17:01		TYP	11-		是 別差 新发生 经 對於 文化 前 以	

May 22, 2012



Mr. Carl Spreng
Colorado Department of Public Health and Environment
HMWMD-HW-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3358

Email: carl.spreng@state.co.us

Re: King's One Hour Cleaners

3217 South Academy Boulevard Colorado Springs, Colorado Terracon Project No. 23107012

Dear Mr. Spreng;

On behalf of New Mission, LLC Terracon Consultants, Inc. (Terracon) is providing the results of a registered well search performed in general accordance with your letter dated March 26, 2012.

The attached figure shows the approximate locations of groundwater wells registered with the State Engineer's Office between S-14 and S-11, and within a half mile downgradient of S-11. Registration records (excluding observation or monitoring wells) are also attached.

Please do not hesitate to contact us should you have any questions or require additional information.

Sincerely,

Terracon Consultants, Inc.

Dan Taylor

Environmental Project Manager

N:\PROJECTS\2010\23107012\Spreng:_042412.docx

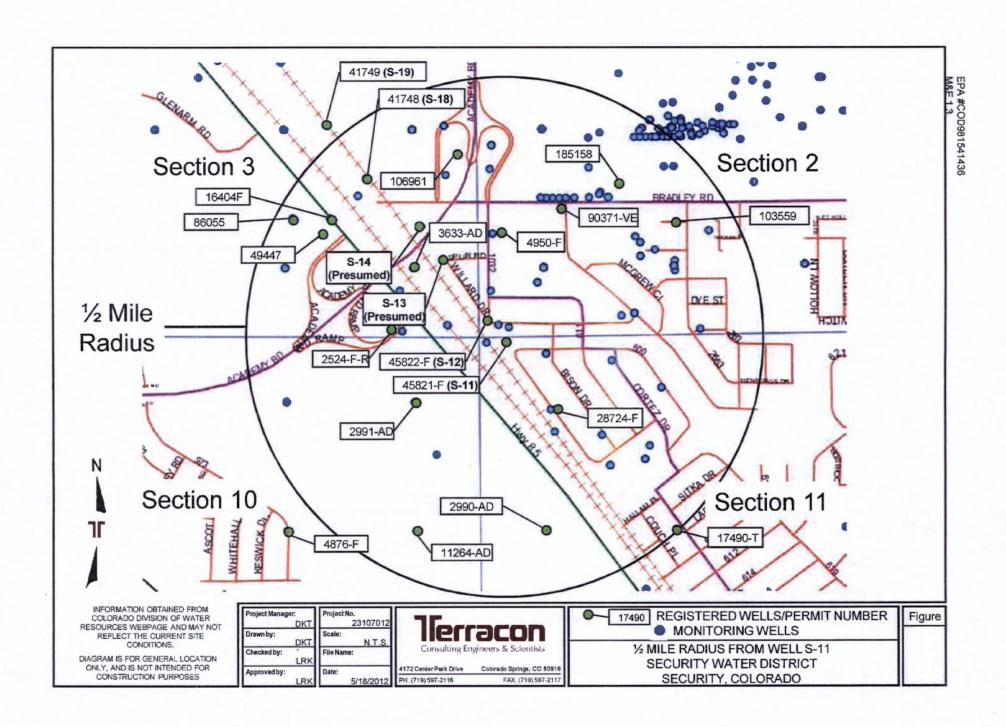
Lawrence R. Keefe

Principal | Office Manager

C. Matt Craddock – New Mission, LLC
Connie H. King – Law Firm of Connie H. King, LLC



Terracon Consultants, Inc. 4172 Center Park Drive P [719] 597 2116 F [719] 597 2117 Colorado Springs, CO:80916 terracon.com



Colorado Department of Natural Resources

Colorado.gov | Contact Us

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Be netely Division of valer Resources

Colorado's Well Permit Search

Well Constructed

Last Refresh: 5/18/2012 12:01:53 AM

Receipt:

9078694 4950-F -

Division: Water District: 2

Permit #: Well Name / #:

County:

10 **EL PASO**

Designated Basin:

Management District:

Case Number:

WDID:

1005928 - WAMPFLER IRRIG WELL NO 1

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** FIRST UNITED PENTECOSTAL CHURH **Address** 3925 BRADLEY RD City/State/Zip COLO SPRGS, CO 80911

والمعالم والمقدونيين المتعافقية والم

[-] Location Information

SW

Approved Well Location:

Q40 Q160 Section Township Range PM SW

15.0S

66.0W Sixth

Footage from Section Lines 1060 S

Northing (UTM y):

2

4291197.7

Easting (UTM x): 521148.4

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 12/18/1968

Date Expires:

Use(s):

IRRIGATION

Aquifer ALL UNNAMED AQUIFERS

Special Use:

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report Nο

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date: 10/07/1963

Well Plugged:

Pump Installation Date:

1st Beneficial Use: 10/07/1963

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate 580 65

35

Driller

Lic # Name 56 CONTEST, JOE

Address Unknown COLO SPRINGS, CO

Phone Number

Ownership Change	03/27/1996	•
Permit Issued	12/18/1968	
Well Construction Report Received	01/20/1964	
Application Received	12/18/1963	
First Beneficial Use	10/07/1963	
Well Constructed	10/07/1963	
[-] Imaged Documents		· ·
Document Name Date Imaged A	notated	
Original File 12/08/2007 N		
	Copyright @ 2009 Colorado Division of Water Resources. All rights rese	erved.

Colorado.gov | Contact Us-

Colorado Division of Water Resources

Colorado's Well Permit Search

Permit Issued: Completion Status Unknown

Last Refresh: 5/18/2012 12:01:53 AM

Receipt: Permit #: 0016643

GARNER R J

Division: **Water District:**

Well Name / #:

90371-VE -County: 10 **EL PASO**

Designated Basin:

Management District:

Case Number: WDID:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name**

Address 3925 BRADLY RD City/State/Zip CO SPGS, CO

[-] Location Information

Approved Well Location:

Q40 Q160 Section SW SW

Township 15.0S

Range 66.0W

Footage from Section Lines Sixth 1290 S 850 W

Northing:(UTM y): 4291270.2

Easting (UTM x): 521335.1

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: **Acres In Tract:**

[-] Permit Details

Date Issued: 08/03/1990

Date Expires:

Use(s):

DOMESTIC Special Use:

Aquifer (s):

Area which may be irrigated:

Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

95224- -

Unknown

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

1st Beneficial Use:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

Driller

Lic # Name

Address

Phone Number

1219 LINDSEY, SHELDON

3624 CITADEL DR NORTH COLO SPRINGS, CO 80909

719-596-4114

[-] Application/Perm	it History	.1
Application Received Permit Issued	08/03/1990 08/03/1990	. '
[-] Imaged Documer Document Name Dat		
	Copyright © 2009 Colorado Division of Water Resources. All rights res	
	Home Contact Us Help Water Links Colorado.gov DNR Privacy Policy Transpare	ency Online Project (TOP)

Colorado.gov | Contact Us

Çolorado Division of alai kesources

Colorado's Well Permit Search

Well Constructed

Last Refresh: 5/18/2012 12:01:53 AM

Receipt: Permit #: 0098193 103559-- Division:

Well Name / #:

Water District: County:

10 **EL PASO**

Designated Basin:

Management District:

Case Number: WDID:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** CLARK DANIEL A

Address 4175 BRADLEY RD

City/State/Zip COLO SPRINGS, CO 80911

[-] Location Information

Approved Well Location:

SW 2

Section

Township 15.05

Range PM 66.0W Sixth

Footage from Section Lines 1140 S

Northing (UTM y):

4291229.8

Easting (UTM x): 521692.2

Spotted from section lines Location Accuracy:

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 12/05/1978

Date Expires:

No

Use(s):

HOUSEHOLD USE ONLY

Aquifer (s):

Special Use:

Area which may be irrigated: Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

No

7836-AD -

<u>Unknown</u>

Comments:

[-] Construction/Usage Details

Well Construction Date: 05/21/1979 Well Plugged:

Pump Installation Date: 1st Beneficial Use:

96

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

96

Lic # Name

76

Address

Phone Number

Driller

71 HAMACHER, T. R.

BOX 86 SIMLA, CO 80835

719-541-2460

State of Colorado Water Resources - View Well Details: Receipt 0098193 M&E 1.3

Driller	71 HAMACHER, ALAN RAY	BOX 86 SIMLA, CO 80835	719-541-2460	
[-] Applicat	tion/Permit History	·		
Well Construc	ction Report Received 10/	1/1979		
Well Construc		21/1979		
Permit Issued	12/0	05/1978		
Application Re	eceived 09/	19/1978		
[-] Imaged	I Documents			
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Colorado's Well Permit Search

Well Constructed

Last Refresh: 5/18/2012 12:01:53 AM

Receipt:

0379753 185158-:- Division: **Water District:**

10

Permit #: Well Name / #:

County:

EL PASO

Designated Basin:

Management District:

Case Number: WDID:

[~] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name**

Address 4070 BRADLEY RD City/State/Zip CO SPGS, CO 80911

[-] Location Information

Approved Well Location:

Q40 Q160 Section Township SW

15.05

66.0W

Range PM Sixth 1530 S

Footage from Section Lines

Northing (UTM y):

4291346.3

Easting (UTM x): 521514.1

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 02/27/1995

Date Expires:

Use(s):

DOMESTIC

Special Use:

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation: 1

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments: 1ST USE APPX 1920

[-] Construction/Usage Details

Well Construction Date: Well Plugged:

Pump Installation Date: 1st Beneficial Use:

Elevation Depth

Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate 12

120

[-] Application/Permit History

Permit Issued

02/27/1995

State of Colorado Western Resources - View Well Details: Receipt 0379753

M&E 1.3

Page 2 of 2

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Colorado's Well Permit Search

Well status UNKNOWN

Last Refresh: 5/18/2012 12:01:53 AM

Receipt:

0338281A 41748-F -

Division:

Permit #: Well Name / #: Water District: County: Management District: 10 EL PASO

Designated Basin:

90CW0028

Case Number: WDID:

1005939 - SECURITY WELL S-18

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** SECURITY WATER DISTRICT

Address PO BOX 5156 City/State/Zip COLO SPRGS, CO 80931

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[-] Location Information

Approved Well Location:

Q160 Section Township SE

15.0S

Range 66:0W

PM Sixth

Footage from Section Lines 1600 S

Northing (UTM y):

4291362.2

Easting (UTM x): 520730.5

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 11/06/1992

Date Expires: 11/06/1993

Use(s):

Special Use:

MUNICIPAL

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

1st Beneficial Use:

Pump Installation Date:

Well Plugged:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Permit Issued

11/06/1992

Application Received

04/29/1992

State of Colorado Matan Resources - View Well Details: Receipt 0338281A M&E 1.3

Page 2 of 2

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Colorado's Well Permit Search

Well status UNKNOWN

Last Refresh: 5/18/2012 12:01:53 AM

Receipt: Permit #: 0338281D 41749 F -

Division: Water District:

2 10

Well Name / #:

EL PASO

Designated Basin:

County Management District:

Case Number:

90CW0028

WDID:

1005940 - SECURITY WELL S-19

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name**

Address

City/State/Zip

SECURITY WATER DISTRICT

PO BOX 5156

COLO SPRGS, CO 80931

[-] Location Information

Approved Well Location:

Q40 Q160 NW SE

Section

Township **15.0S**

Range 66.0W Sixth

Footage from Section Lines 2150 S

Northing (UTM y):

4291530.7

Easting (UTM x): 520606.8

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 11/06/1992

Date Expires: 11/06/1993

Use(s):

MUNICIPAL

Aquifer (s): ALL UNNAMED AQUIFERS

Special Use:

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Permit Issued

11/06/1992

Application Received

04/29/1992

State of Coleman Western Resources - View Well Details: Receipt 0338281D

M&E 1.3

Page 2 of 2

[-] Imaged Documents

Document Name Date Imaged Annotated

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Colorado's Well Permit Search

Well Constructed

Helps: Last Refresh: 5/18/2012 12:01:53 AM

Receipt: Permit #: 9084787 106961-- Division: **Water District:**

10

Well Name / #:

County:

EL PASO

Designated Basin:

Management District:

Case Number: WDID:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** ROCKY MOUNTAIN COMPONENTS **Address** 3650 BRADLEY RD City/State/Zip COLO SPRINGS, CO 80911

[-] Location Information

Approved Well Location:

Q160 SE

Township 15.05

Range PM 66.0W Sixth

Footage from Section Lines 1850 S

Northing (UTM y):

4291437.7

Easting (UTM:x): 521013:2

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 05/31/1979

Date Expires:

Use(s): OTHER Aquifer (5):

Special Use:

Area which may be irrigated: 1 acres

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

No.

Comments:

[-] Construction/Usage Details

Well Construction Date: 10/23/1979

Pump Installation Date: 03/11/1980

Well Plugged:

1st Beneficial Use:

Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate **Elevation Depth** 12 40

80

Phone Number

Driller

Lic# Name 150 HARDING, FRED E.

5400 SHERIDAN BLVD #256 ARVADA, CO 80002-7037

303-362-1240

Pump Installer

BOX 68 PEYTON, CO 80831

862 WEEKS, MERRIUL

719-749-2300

[-] Application/Permit History			
Pump Installation Report Received	05/02/1980	-	•
Pump Installed	03/11/1980		
Well Construction Report Received	01/08/1980		
Well Constructed	10/23/1979		
Permit Issued	05/31/1979		
Application Received	12/18/1978	•	
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Colorado's Well Permit Search

Application Denied

Last Refresh: 5/17/2012 12:01:27 AM

Receipt:

0012827

SPROUL FRED C.

Division:

Permit #:

Water District: 3633-AD -

10

Well Name / #:

County:

EL PASO

Designated Basin: Case Number:

Management District:

WDID:

[-] Applicant/Owners History

Date Range Unknown - Present Applicant/Owner Name

Address

City/State/Zip

CO. SPRINGS, CO 80931

[-] Location Information

Approved Well Location:

Q40 Q160 Section

Township

Range

Footage from Section Lines

15.0S 66.0W SE 3 Sixth

Northing (UTM y):

4291087.7

Easting (UTM x): 520878!5

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 03/01/1973

Date Expires:

Use(s): Special Use:

MUNICIPAL

Aquifer (s):

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter No

Geophysical Log

Abandonment Report

No

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Permit Issued

03/01/1973

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Colorado's Well Permit Search

Well Constructed

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Receipt:

0010541 2524-F -R Division:

10

EL PASO

Permit #:

Water District:

Well Name / #:

County:

Designated Basin:

Management District:

Case Number: WDID:

1005869 - D-L-W-WELL NO 3

[-] Applicant/Owners History

Date Range Unknown - Present

Applicant/Owner Name DANIELS SAND

Address

City/State/Zip COLO SPRGS, CO 80901

المهيم الأربيبليبيناي

[-] Location Information

Approved Well Location:

Q40 Q160 Section

Township **15.0S**

Range 66.0W Sixth 75 S

Footage from Section Lines

SE Northing (UTM y):

4290897.5

Easting (UTM x): 520807.5

Location Accuracy:

Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 11/06/1985

Date Expires: 11/06/1986

Use(s): Special Use:

COMMERCIAL

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter No

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

2524-F -

9078504

Comments:

[-] Construction/Usage Details

Well Construction Date: 12/20/1985

Pump Installation Date: 12/12/1985

Well Plugged:

1st Beneficial Use:

Elevation Depth

Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate 350 80

92

41 LIC # Name

Address

Phone Number

Driller

946 MUELLER, DONALD T

BOX 421 YUMA, CO 80759

303-848-5137

Pump Installer	946 MUELLER,	DONALD T	BOX 421 YUMA, CO 80759	303-848-5137
[-] Application/Permit H	listory			
Pump Installation Report Re	ceived (1/22/1986		•
Well Construction Report Re	ceived (1/22/1986		
Well Constructed	:	12/20/1985		
Pump Installed	:	2/12/1985	-	
Permit Issued	:	1/06/1985		•
Application Received	()5/20/1985		
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Document Name	Date Imaged	Annotated		
Original Replacement File 1	2/08/2007	No		
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Colorado's Well Permit Search

Well Constructed

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Receipt:

9084135

Division:

2

Permit #:

86055- -**Water District:** 10

Well Name / #:

County:

EL PASO

Designated Basin: Case Number:

Management District:

WDID:

[-] Applicant/Owners History

Date Range

Applicant/Owner Name PECK FANNIE

Address 4290 S HTGHWAY 85-87 City/State/Zip

COLORADO SPRINGS, CO 80908

[-] Location Information

Approved Well Location:

Q40 Q160 Section NW SE

Township 15.0S

Range Sixth 1197 S 66.0W

Footage from Section Lines 1880 E

Northing (UTM y):

4291240.5

Easting (UTM x): 520503.3

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued:

Date Expires:

Use(s): Special Use:

DOMESTIC

Aquifer (s):

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date:

Well Plugged:

Pump Installation Date:

1st Beneficial Use: 12/31/1955

Elevation Depth

Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

20 50 36

[-] Application/Permit History

First Beneficial Use

12/31/1955

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Document Name Original File	Date Imaged 12/05/2007	Annotated No				
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Colorado's Well Permit Search

Well Constructed

Last Refresh: 5/17/2012 12:01:27 AM

Receipt:

9082652

Division:

10

Permit #: Well Name / #: 49447- -

Water District: County:

EL PASO

Designated Basin:

Management District:

Case Number:

Unknown - Present

WDID:

Date Range

[-] Applicant/Owners History

Applicant/Owner Name

Address

City/State/Zip

PINELLO TONY

4380 HY 85-87

COLO SPGS, CO 80909

[-] Location Information

SW

Approved Well Location:

Q40 Q160 Section

Township 15.05

Range PM 66.0W

Footage from Section Lines

Sixth 1045 S

Northing (UTM y):

4291193.7

Easting (UTM x): 520595.3

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 10/20/1971

Date Expires:

No

Use(s): Special Use:

DOMESTIC

Aquifer (s): ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

No

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date: 10/23/1971

Well Plugged:

Pump Installation Date:

1st Beneficial Use: 10/23/1971

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

Lic.# Name

Address

Phone Number 719-541-2460

Driller

71 HAMACHER, T. R.

BOX 86 SIMLA, CO 80835

Driller

71 HAMACHER, ALAN RAY

BOX 86 SIMLA, CO 80835

719-541-2460

Well Construction Report Received	04/03/1972		
First Beneficial Use	10/23/1971		
Well Constructed	10/23/1971		
Permit Issued	10/20/1971		
[-] Imaged Documents			
Document Name Date Imaged A	nnotated		
Original File 12/03/2007 N	D		
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Colorado's Well Permit Search

Well Constructed

Last Refresh: 5/17/2012 12:01:27 AM

Receipt:

9079843 16404-F - Division:

Permit #:

Water District: County:

10 **EL PASO**

Well Name / #: **Designated Basin:**

Management District:

Case Number: WDID:

1005570 - STRATMOOR WELL NO 10

[-] Applicant/Owners History

Date Range

Applicant/Owner Name STRATMOOR HILLS WATER DIST Address 1811 'B' ST

City/State/Zip COLO SPGS, CO 80906

[-] Location Information

Approved Well Location:

040 0160 Section SE

Township 15.0S

Range

Footage from Section Lines

1200 S 66.0W Sixth

Northing (UTM y):

4291240,7

Easting (UTM x): 520619.1

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued:

Date Expires:

Use(s):

MUNICIPAL Special Use:

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated: 1000 acres Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

Well Plugged:

Pump Installation Date: 1st Beneficial Use: 01/27/1973

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

First Beneficial Use

01/27/1973

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Colorado's Well Permit Search

Well Constructed

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Receipt: Permit #:

9078691 4876-F -

Division: Water District: 2 10

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Well Name / #:

County:

EL PASO

Designated Basin:

Management District:

Case Number:

WDID:

1005629 - CLEAR SPRINGS RANCH P-02

[-] Applicant/Owners History

Date Range Unknown - Present Applicant/Owner Name

Address

City/State/Zip

CLEAR SPRINGS RANCH INC & SPRING RA

RT 1 BOX 84

COLO SPRGS, CO 80901

[-] Location Information

Approved Well Location:

Q160 Section

Township 15.05

Range 66.0W Sboth

Footage from Section Lines

NE 10

4290276.7

Easting (UTM:x): 520486.1

Northing (UTM y):

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Expires:

Date Issued: Use(s): Special Use:

MUNICIPAL

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

3488

28

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use: 08/05/1963

Elevation Depth

Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

64

[-] Application/Permit History

First Beneficial Use

08/05/1963

[-] Imaged Docu	ments		
Document Name Original File	Date Imaged 12/08/2007	Annotated No	
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Colorado's Well Permit Search

Application Denied

Last Refresh: 5/17/2012 12:01:27 AM

Receipt:

0265081C 11264-AD - Division:

2 10

Permit #: Well Name / #: **Water District:** County:

EL PASO

Designated Basin:

Management District:

Case Number:

WDID:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name**

Address

City/State/Zip

CO CENTRE METRO DIST.

COLO. SPRINGS, CO 80925

[-] Location Information

Approved Well Location: SE

Q40 Q160 Section

Township

Range

Footage from Section Lines

10 15.0S 66.0W Sixth NE

Northing (UTM y):

4290276.2

Easting (UTM x): 520885.5

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 01/30/1987

Date Expires:

Use(s):

MUNICIPAL Special Use:

Aquifer (s): ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Permit Issued

01/30/1987

Application Received

05/22/1986

[-] Imaged Documents

Document Name Date Imaged Annotated

Application Denied 12/01/2007 N

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Colorado's Well Permit Search

Application Denied

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Receipt:

0012798

Division:

Permit #:

2991-AD -

Water District: County:

10 **EL PASO**

Well Name / #:

Designated Basin:

Management District:

Case Number:

WDID:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** CLEAR SPRING RANCH INC.

Address 33 ALTA VISTA RD

City/State/Zip CO. SPRINGS, CO 80906

[-] Location Information

Approved Well Location:

040 0160 Section

Township

PM Range

Footage from Section Lines

NE 10 15.05 66.0W Sixth

Northing (UTM y): 4290675.2

Easting (UTM x): 520882.6

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 05/18/1972

Date Expires:

Use(s): Special Use:

MUNICIPAL

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Application Received

05/18/1972

Permit Issued

05/18/1972

ľ	[-]	Imaged	Documents	į

Document Name Date Imaged Annotated

Original File

12/01/2007 No

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Colorado's Well Permit Search

Application Denied

Last Refresh: 5/18/2012 12:01:53 AM

Receipt: Permit #: 0265081C 11264-AD - Division: **Water District:**

10

germeentreit in der beginne wer-

Well Name / #:

County:

EL PASO

Designated Basin: Case Number: WDID:

Management District:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name**

Address

City/State/Zip

CO CENTRE METRO DIST.

COLO. SPRINGS, CO 80925

[-] Location Information

Approved Well Location:

SE

Township

Footage from Section Lines

NE 10 15.0S 66.0W Sixth

Northing (UTM y):

4290276.2

Easting (UTM x): 520885.5

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 01/30/1987

Date Expires:

Use(s):

MUNICIPAL Special Use:

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

No

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date: 1st Beneficial Use:

Weil Plugged:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Permit Issued

01/30/1987

Application, Received

05/22/1986

[-] Imaged Documents

Document Name Date Imaged Annotated

Application Dented 12/01/2007 N

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Colorado's Well Permit Search

Well Constructed

Last Refresh: 5/17/2012 12:01:27 AM

Receipt:

0027140

Division:

Permit #: 45821-F - Water District:

Weli Name / #:

County:

10 **EL PASO**

2

Designated Basin:

Management District:

Case Number:

W0112

WDID:

1005560 - SPROUL WELL NO 11

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name**

Address

City/State/Zip

SECURITY WATER DISTRICT 231 SECURITY BLVD COLORADO SPRINGS, CO 80911

[-] Location Information

NW

Approved Well Location:

Q40 Q160 Section NW

11

Township

Range

Footage from Section Lines

960 N 15.05 66.0W Sixth

Northing (UTM y):

4290584.2

Easting (UTM x): 521314.3

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 12/08/1995

Date Expires:

Use(s):

MUNICIPAL IRRIGATION Aquifer ALL UNNAMED AQUIFERS

Special Use:

Area which may be imigated:

Maximum annual volume of appropriation: 117

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

70

Pump Installation Date:

Well Plugged:

1st Beneficial Use: 07/31/1949

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate 925

[-] Application/Permit History

Ownership Change 04/08/2002
Permit Issued 12/08/1995
Application Received 03/08/1995
Hirst Beneficial Use 07/31/1949

[-] Imaged Documents

Document Name Date Imaged Annotated

Original File 12/09/2007 No Change in Owner Name/Address 12/01/2007 No

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Colorado's Weli Permit Search

Well Constructed

Hen Last Refresh: 5/17/2012 12:01:27 AM

Receipt:

9081361

Division:

Permit #:

28724-F -

Water District:

10 **EL PASO**

Well Name / #:

County:

Designated Basin: Case Number:

Management District:

WDID:

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** SECURITY WTR & SANITARY DIST Áddress 231 SECURITY BLVD City/State/Zip SECURITY, CO 80911

[-] Location Information

Approved Well Location:

Q40 Q160 Section NW

Township 15.0S

Range 66.0W Sixth 740 N

Northing (UTM y):

11

4290651.2

Easting (UTM x): 521326.0

Location Accuracy:

Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 07/18/1985

Date Expires:

No

Use(s):

MUNICIPAL Special Use:

Aquifer ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

No

Cross Reference

Permit(s):

Permit Number Receipt

No

28724-F -R

0010535

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use: 07/31/1949

Elevation Depth

Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

925

[-] Application/Permit History

Application Received

07/18/1985

Permit Issued First Beneficial Use 07/18/1985 07/31/1949

[-] Imaged Documents

Document Name Date Imaged Annotated

Original File

12/08/2007

No :

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Colorado's Well Permit Search

Well Constructed

Receipt: Permit #: 0027142 45822-F - Division: Water District:

10

Well Name / #:

County:

EL PASO

Designated Basin:

Management District:

Case Number:

W0112

WDID:

1005561 - SPROUL WELL NO 12

[-] Applicant/Owners History

Date Range Unknown - Present **Applicant/Owner Name** SECURITY WATER DISTRICT

Address 231 SECURITY BLVD 5030 City/State/Zip

COLORADO SPRINGS, CO 80911

Last Refresh: 5/17/2012 12:01:27 AM

[-] Location Information

Approved Well Location:

Q40 Q160 Section NW

Township 15.0S

Range PM 66.0W 50 N Sbth

Footage from Section Lines

Northing (UTM y):

4290858.7

Easting (UTM x): 521103.4

Location Accuracy: Spotted from section lines

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: Acres in Tract:

[-] Permit Details

Date Issued: 12/08/1995

Date Expires:

Use(s):

MUNICIPAL **IRRIGATION** Aquifer (s): ALL UNNAMED AQUIFERS

Special Use:

Area which may be irrigated: Maximum annual volume of appropriation: 89

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use: 07/31/1949

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

709

[-] Application/Permit History

 Ownership Change
 04/08/2002

 Permit Issued
 12/08/1995

 Application Received
 03/08/1995

 First Beneficial Use
 07/31/1949

[-] Imaged Documents

Document Name Date Imaged Annotated

<u>Original File</u> 12/09/2007 No <u>Change in Owner Name/Address</u> 12/01/2007 No

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Colorado's Well Permit Search

Application Denied

Last Refresh: 5/18/2012 12:01:53 AM

Receipt:

0027579

Division:

10

Permit #: Well Name / #: 2990-AD -**Water District:** County:

EL PASO

Designated Basin:

Management District:

Case Number:

WDID:

[-] Applicant/Owners History

Date Range

Applicant/Owner Name CLEAR SPRING RANCH INC.

Address 33 ALTA VISTA RD City/State/Zip CO. SPRINGS, CO 80906

[-] Location Information

Approved Well Location:

Q40 Q160 Section

Township Range

Footage from Section Lines

15.05 66.0W Sixth

Northing (UTM y):

4290277.7

Easting (UTM x): 521286.9

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID:

Acres in Tract:

[-] Permit Details

Date Issued: 05/18/1972

Date Expires:

No

Use(s): Special Use:

MUNICIPAL

Aquifer (s): ALL UNNAMED AQUIFERS

Area which may be irrigated:

Maximum annual volume of appropriation:

Statute:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report No

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use:

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate

[-] Application/Permit History

Application Received

05/18/1972

Permit Issued

05/18/1972

State of Colorado Watsri Resources - View Well Details: Receipt 0027579 M&E 1.3

[-] Imaged Docu	ments	
Document Name	Date Imaged	Annotated
Original File	12/01/2007	No:
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Colorado's Well Permit Search

Well Constructed

Helps: Last Refresh: 5/18/2012 12:01:53 AM

Receipt:

9080001

Division:

Permit #: 17490-T - Water District: County:

2 10 **EL PASO**

Well Name / #:

Designated Basin:

Management District:

Case Number:

1005403 - VENETUCCI WELL NO 3

[-] Applicant/Owners History

Date Range

Applicant/Owner Name

City/State/Zip

Unknown - Present

PIKES PEAK COMMUNITY FOUNDTAION

MICHAEL HARRIGAN PO BOX 1443

COLORADO SPRINGS, CO 80901

[-] Location Information

Approved Well Location:

Q160 Section

Township

Range

Footage from Section Lines Sixth

66.0W NW 15.05 11

Northing (UTM y):

4290281.5

Easting (UTM x): 521691.3

Location Accuracy: Spotted from quarters

Physical Address

City/State/Zip

Subdivision Name

Filing Block Lot

Parcel ID: **Acres in Tract:**

[-] Permit Details

Date Issued:

Date Expires:

Use(s): Special Use:

IRRIGATION

Aquifer ALL UNNAMED AQUIFERS (s):

Area which may be irrigated:

Maximum annual volume of appropriation:

Permit Requirements:

Totalizing Flow Meter

Geophysical Log

Abandonment Report

Cross Reference

Permit(s):

Permit Number Receipt Description

No

Comments:

[-] Construction/Usage Details

Well Construction Date:

Pump Installation Date:

Well Plugged:

1st Beneficial Use: 11/01/1941

Elevation Depth Perforated Casing (Top) Perforated Casing (Bottom) Static Water Level Pump Rate 800 39

81

[-] Application/Permit History

Ownership Change

09/30/2005

First Beneficial Use

11/01/1941

[-] Imaged Documents

Document Name

Date Imaged Annotated

Original File

12/08/2007

Change in Owner Name/Address 11/28/2007

No No

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June 26, 2012



Mr. Carl Spreng
Colorado Department of Public Health and Environment
HMWMD-HW-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3358

Email: carl.spreng@state.co.us

Re: King's One Hour Cleaners

3217 South Academy Boulevard Colorado Springs, Colorado Terracon Project No. 23107012

Dear Mr. Spreng;

On behalf of New Mission, LLC, Terracon Consultants, Inc. (Terracon) is providing the results of groundwater sampling performed in general accordance with your letter dated March 26, 2012. The general location of the King's One Hour Cleaners site is shown on Figure 1 included as an attachment.

On June 13, 2012, Terracon collected groundwater samples from wells MW-4, MW-8, MW-10, and MW-11 shown on Figure 2 included as an attachment. These wells were selected by Colorado Department of Public Health and Environment (CDPHE) for sampling because tetrachloroethylene (PCE) was detected in groundwater samples previously collected from these wells. Per CDPHE guidance, groundwater samples were collected from each well at approximately mid-depth in the observed water column using Hydra Sleeve samplers. In addition, groundwater samples were also collected from well MW-11 approximately at the top and bottom of the observed water column to assess potential stratification of PCE in the MW-11 water column.

Sample results for PCE are summarized in the table below. The laboratory's report for the groundwater sampling completed is included as an attachment.

Sample Location	PCE Result (μg/l)
MW-4	2.7
MW-8	2.5
MW-10	7.2
MW-11 (top/shallow))	4.1
MW-11 (middle depth)	14
MW-11 (bottom)	12

Note: µg/l = micrograms per liter

Environmental







As requested in your letter dated March 26, 2012, CDPHE has requested that subsurface soils be assessed for potential for residual soil contamination near the presumed release area. Terracon proposes to drill a soil boring to collect soil samples for field screening and analytical testing near existing monitoring MW-2 (see Figure 2).

The soil boring will be advanced using a truck-mounted drill rig and hollow-stem auger drilling techniques to the top of the groundwater table, estimated at a depth of approximately 80 feet below ground surface (bgs). Soil samples will be collected in advance of the augers at approximately 5-foot intervals using a split-spoon sampling tool. Soil samples will be evaluated in the field relative to lithology, color and relative moisture content. In addition, the samples will be field screened using sensory methods and a photoionization detector (PID) to detect the presence of volatile organic compounds (VOCs). Up to eight soil samples will be selected for laboratory analyses for PCE using EPA Method 8260B based on the results of the field screening.

Drilling equipment will be cleaned using a high-pressure washer prior to beginning the project. Non-dedicated sampling equipment will be cleaned using an Alconox® detergent wash and potable water rinse before commencement of the project and prior to collection of each soil sample.

A letter report of the investigation activities will be prepared and will include the following information:

- Documentation of field activities.
- Map showing the soil boring location
- Soil boring log
- Analytical laboratory results
- Data evaluation and presentation of findings
- Recommendations regarding further action

Please do not hesitate to contact us should you have any questions or require additional information.

Respectfully submitted,

Terracon Consultants, Inc.

Lawrence R. Keefe

Principal | Office Manager

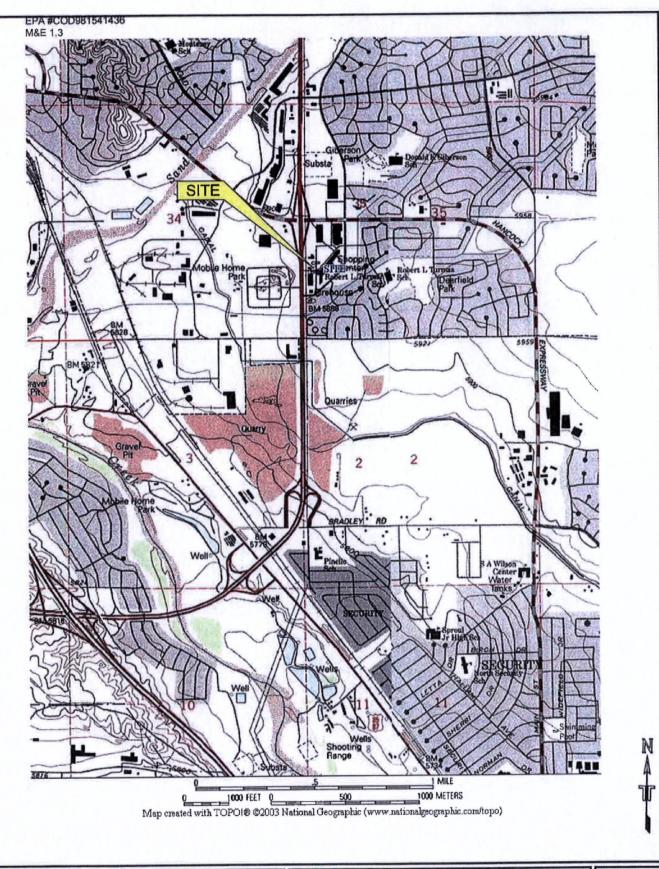
N:\PROJECTS\2010\23107012\Spreng _062612.docx

Dean R. Parson, P.E.

And FOR

Principal

Matt Craddock – New Mission, LLC
 Connie H. King – Law Firm of Connie H. King, LLC



Project Mngr:	LK	Project No. 23107012
Drawn By:	DJS	Scale: AS NOTED
Checked By:	LK	06/20/2010
Approved By:	LK	

Terracon
Consulting Engineers and Scientists

 Consulting Engineers and Scientists

 4172 Center Park Dr.
 Colorado Springs, CO 80916

 PH. (719) 597-2116
 FAX. (719) 597-2117

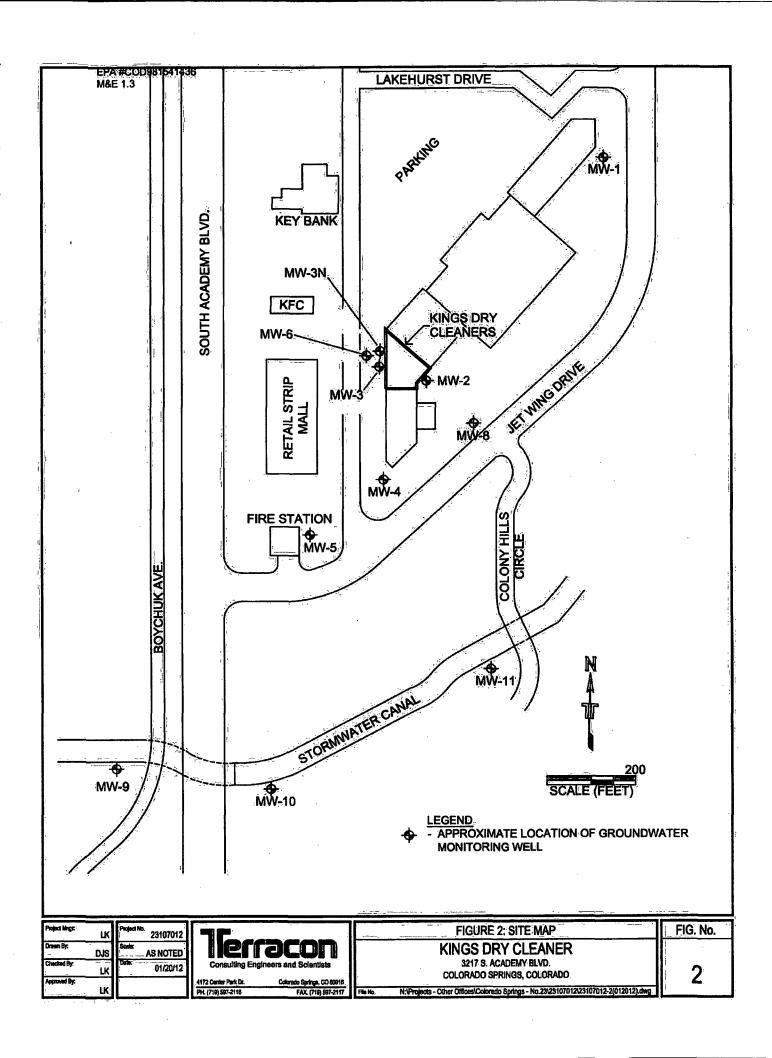
FIGURE 1: SITE LOCATION MAP KINGS DRY CLEANER

3217 S. ACADEMY BLVD. COLORADO SPRINGS, COLORADO

N:\Projects - Other Offices\Colorado Springs - No.23\23107012\23107012-1(SVM).dwg

FIG. No.

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Tax I.D. 62-0814289

Est. 1970

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Report Summary

Monday June 18, 2012

Report Number: L580392 Samples Received: 06/14/12 Client Project: 23107012

Description: Well_Sampling-Kings

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Daphne Richards , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197, FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704/B10041, ND - R-140. NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1, TX - T104704245-11-3, OK - 9915, PA - 68-02979

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.

Note: The use of the preparatory EPA Method 3511 is not approved ox endorsed by the CA ELAP.

This report may not be reproduced, except in full, without written approval from ESC Lab Sciences. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



Tax I.D. 62-0814289

Est. 1970

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REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L580392-01

Date Received : Constitution : Const

June 14, 2012 Well Sampling-Kings

Site ID :

Sample ID

ı MW-4

Project # : 23107012

Collected By : Paul MIllet Collection Date : 06/13/12 16:55

Parameter	Result	Det. Limit	Units	Method	Date	Dili
Volatile Organics						
Acetone	BDL	0.050	mg/l	8260B	06/15/12	1
Acrolein	BDL	0.050	mg/l	8260B	06/15/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	06/15/12	1
Benzene	BDL	0.0010	mg/1	8260B	06/15/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1 1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	06/15/12	
Bromoform	BDL	0.0010	mg/1	8260B	06/15/12	1
Bromomethane	BDL	0.0050	mg/1	8260B	06/15/12	1
n-Butylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	
Carbon tetrachloride	BDL	0.0010	mg/1	8260B	06/15/12	1
Chlorobenzene	. BDL	0.0010	mg/l	8260B	06/15/12	1 .
Chlorodibromomethane	BDL	0.0010	mg/1	B260B	06/15/12	1
Chloroethane	BDL	0.0050	mg/1	8260B	06/15/12	1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	06/15/12	1
Chloroform	BDL	0.0050	mg/l	8260B	06/15/12	
Chloromethane	BDL	0.0025	mg/l	8260B	06/15/12	1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	06/15/12	1
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	06/15/12	1.
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Dibromomethane	BDL	0.0010	mg/l	82,60B	06/15/12	1
1,2-Dichlorobenzene	BDT	0.0010	mg/l	8260B	06/15/12	1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1.
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	.1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	
trans-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	06/15/12	1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1;
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1.
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Ethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	06/15/12	4
Isopropylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	06/15/12	1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received Description June 14, 2012 Well Sampling-Kings ESC Sample # : L580392-01

Site ID :

Sample ID

Project # : 23107012

Collected By : Collection Date : Paul MIllet 06/13/12 16:55

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	06/15/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Naphthalene	BDL	0.0050	mg/l	8260B	06/15/12	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Styrene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	06/15/12	· 1
Tetrachloroethene	0.0027	0.0010	mg/1	8260B	06/15/12	1
Toluene	BDL	0.0050	mg/l	8260B	06/15/12	ī
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichloroethene	BDL	0.0010	mg/1	8260B	06/15/12	ī
Trichlorofluoromethane	BDL	0.0050	mq/1	8260B	06/15/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	06/15/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
Vinyl chloride	BDL	0.0010	mg/l	8260B	06/15/12	ī
Xylenes, Total	BDL	0.0030	ing/1	8260B	06/15/12	ī
Surrogate Recovery		0.000	101			
Toluene-d8	92.6		% Rec.	8260B	06/15/12	1
Dibromofluoromethane	99.4		& Rec.	8260B	06/15/12	ī
4-Bromofluorobenzene	108.		* Rec.	8260B	06/15/12	ī

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
The reported analytical results relate only to the sample submitted.
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Reported: 06/18/12 14:32 Printed: 06/18/12 14:33



Tax I.D. 62-0814289

L580392-02

Est. 1970

MOUR LABOF CHOICE

REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # :

Date Received pure 14, 2012 Description Well Sampling-Kings

Site ID :

Sample ID

MM-8

Project # : 23107012

Collected By : Collection Date :

Paul MIllet 06/13/12 16:40

Parameter	_ Result	DetLimit	Units _	Method	_ Date	Di
Volatile Organics	•					
Acetone	BDL	0.050	mq/l	8260B	06/15/12	1-
Acrolein	BDL	0.050	mg/1	8260B	06/15/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	06/15/12	1
Benzene	BDL	0.0010	mq/l	8260B	06/15/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
Bromodichloromethane	BDL	0.0010	mg/1	8260B	06/15/12	1
Bromoform	BDL	0.0010	mg/l	8260B	06/15/12	7
Bromomethane	BDL	0.0050	mg/l	8260B	06/15/12	1 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1.
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Carbon tetrachloride	BDL	0.0010	mg/1	8260B	06/15/12	ī
Chlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	90
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Chloroethane	BDL	0.0050	mg/1	8260B	06/15/12	
2-Chloroethyl vinyl ether	BDL	0.050	mg/1	8260B	06/15/12	111111111111111
Chloroform	BDL	0.0050		. 8260B	06/15/12	- 4
Chloromethane	BDL	0.0025	mg/1	8260B	06/15/12	4
2-Chlorotoluene	BDL	0.0010		8260B		- 4
			mg/1		06/15/12	4
4-Chlorotoluene	BDL	0.0010	mg/1	8260B	06/15/12	1.
1,2-Dibromo-3-Chloropropane	BDL BDL	0.0050	mg/l	8260B	06/15/12	10
1,2-Dibromoethane		0.0010	mg/l	8260B	06/15/12	
Dibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	-
1,2-Dichlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	_ I
1,4-Dichlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1 1
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	- 1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1 1 1 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1
1.3-Dichloropropane	BOL	0.0010	mg/l	8260B	06/15/12	1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1 1 1 1 1 1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1,
Ethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	06/15/12	1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
p-Isopropyltoluene	BDL	0.0010	mg/1	8260B	06/15/12	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)



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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

June 14, 2012 Well Sampling-Kings Date Received Description

ESC Sample # : L580392-02

Sample ID

Site ID :

Project # : 23107012

Paul MIllet 06/13/12 16:40 Collected By : Collection Date :

rameter	Result	Det. Limit	Units	Method	Date	Dil
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	06/15/12	1.
Methylene Chloride	BDL	0.0050	mg/l	8260B	06/15/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Naphthalene	BDL	0.0050	mg/l	8260B	06/15/12	1
n-Propylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
Styrene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1,2-Tetrachlorosthane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Tetrachloroethene	0.0025	0.0010	mg/l	8260B	06/15/12	1
Toluene	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1.1.1-Trichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	ī
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	06/15/12	ī
1,2,4-Trimethylbenzene	BDL	0,0010	mg/l	8260B	06/15/12	ī
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ĩ
1,3,5-Trimethylbenzene	BDL	0.0010	mq/l	8260B	06/15/12	1
	BDL	0.0010	mg/l	8260B	06/15/12	ĩ
Vinyl chloride	BDL	0:0030	mg/l	8260B	06/15/12	ā
Xylenes, Total	DVU	0.0050	my/ =	72000	V V, 20. 1E	-
rrogate Recovery	92.6		% Rec.	8260B	06/15/12	1
Toluene-d8 Dibromofluoromethane	99.2		* Rec.	8260B	06/15/12	ī
4-Bromofluorobenzene	104.		Rec.	8260B	06/15/12	î

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:

The reported analytical results relate only to the sample submitted.

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Tax I.D. 62-0814289

Est. 1970

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REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L580392-03

Date Received Description June 14, 2012 Well Sampling-Kings

Site ID :

Sample ID

Project #: 23107012

Paul MIllet 06/13/12 09:20 Collected By : Collection Date :

Parameter	Result	Det. Limit	Units	Method	Date	D11:
Volatile Organics		•				
Acetone	BDL	0.050	mg/l	8260B	06/15/12	i,
Acrolein	BDL	0.050	mg/l	8260B	06/15/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	06/15/12	1
Benzene	BDL	0,0010	mg/l	8260B	D6/15/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1 1 1 1 1
Bromodichloromethane	BDL	0.0010	mq/l	8260B	06/15/12	1
Bromoform	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromomethane	BDL	0.0050	mg/l	8260B	06/15/12	1
n-Butylbenzene	BDL	0,0010	mq/l	8260B	06/15/12	1
sec-Butylbenzene	BDL	0.0010	mg/l	6260B	06/15/12	1
tert-Butylbenzene	BDL	0.0010	mq/l	8260B	06/15/12	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	06/15/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Chlorodibromomethane	BDL	0.0010	mq/1	8260B	06/15/12	1
Chloroethane	BDL	0.0050	mg/l	8260B	06/15/12	1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	06/15/12	1
Chloroform	BDL	0.0050	mg/l	8260B	06/15/12	1
Chloromethane	BDL	0.0025	mg/1	8260B	06/15/12	1.
2-Chlorotoluene	BDL	0.0010	mg/1	8260B	06/15/12	
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	06/15/12	-1)
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Dibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1 1 1 1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,3-Dichloropropane	BDL	0.0010	mq/1	8260B	06/15/12	1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	1 1 1 1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	1 1 1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Ethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Hexachloro-1,3-butadiene	BDL	040010	mg/l	8260B	06/15/12	1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	06/15/12	1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(FQL)



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Tax I.D. 62-0814289

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REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

June 14, 2012 Well Sampling-Kings

Date Received Description Sample ID

MW-10

:

Collected By : Collection Date :

Paul MIllet 06/13/12 09:20

ESC Sample # : L580392-03

Site ID :

23107012 Project # :

rameter	Result	Det. Limit	Units	Method .	Date	Dil
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	06/15/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Naphthalene	BDL	0.0050	mg/l	8260B	06/15/12	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1.
Styrene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Tetrachloroethene	0.0072	0.0010	mg/l	8260B	06/15/12	1
Toluene	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
1,2,4-Trichlorobenzene	BDL	0.0010	mq/l	8260B	06/15/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/1	8260B	06/15/12	1
Trichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	06/15/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	06/15/12	ī
Xylenes, Total	BDL	0.0030	mg/1	8260B	06/15/12	1
rrogate Recovery						-
Toluene-d8	95.9		% Rec.	8260B	06/15/12	1
Dibromofluoromethane	99.5		% Rec.	8260B	06/15/12	ī
4-Bromofluorobenzene	99.8		% Rec.	8260B	06/15/12	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:
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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received : June 14, 2012
Description : Well Sampling-Kings

ESC Sample # : L580392-04

Site ID :

Sample ID

MW-11 SHALLOW

Project # : 23107012

Paul MIllet 06/13/12 09:00 Collected By Collection Date

Parameter_	Result	Det. Limit	Units	Method	Date	Dil.
Volatile Organics						
Acetone	BDL	0.050	mq/l	8260B	06/15/12	1
Acrolein	BDL	0.050	mg/1	8260B	06/15/12	1
Acrylonitrile	BDL	0.010	mq/l	8260B '	06/15/12	
Benzene	BDL	0.0010	mg/1	8260B	06/15/12	1:
Bromobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromoform	BDL	0.0010	mg/l	9260B	06/15/12	1
Bromomethane	BDL	0.0050	mg/l	8260B	06/15/12	1
n-Butylbenzene	BDL	0.0010	mq/l	8260B	06/15/12	1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	06/15/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Chloroethane	BDL	0.0050	mg/l	8260B	06/15/12	i
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	06/15/12	ī
Chloroform	BDL	0.0050	mq/1	8260B	06/15/12	ï
Chloromethane	BDL	0.0025	mg/l	8260B	06/15/12	ī
2-Chlorotoluene	BDL	0.0010	mq/1	8260B	06/15/12	ī
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	06/15/12	r T T
1.2-Dibromoethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
Dibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
1.2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	
1,4-Dichlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	ī
Dichlorodifluoromethane	BDL	0.0050	mq/l	8260B	06/15/12	î
1.1-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ĩ
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ĩ
trans-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	06/15/12	î
1,2-Dichloropropane	BDL	0.0010	mg/1	0260B	06/15/12	ī:
1,1-Dichloropropene	BDL	0.0010	mg/1	9260B	06/15/12	÷.
1,3-Dichloropropane	BDL	0.0010	mg/1	8260B	06/15/12	î.
cis-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B	06/15/12	î
trans-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B	06/15/12	1:
2.2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	î
Di-isopropyl ether	BDL	0.0010	mg/1	6260B	06/15/12	
Ethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ĩ
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	06/15/12	1
Isopropylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	i
	BDL.	0.0010	mg/l	8260B		î
p-Isopropyltoluene	יחמפ	0.0010	mg/1	02000	06/15/12	

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

% Rec.

% Rec.

8260B

8260B 8260B

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

June 14, 2012 Well Sampling-Kings Date Received : Description : Description

ESC Sample # : L580392-04

Sample ID MW-11 SHALLOW Site ID :

Collected By : Collection Date : Paul MIllet 06/13/12 09:00 Project # : 23107012

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	06/15/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1'
Naphthalene	BDL	0.0050	mg/l	8260B	06/15/12	.1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1.
Styrene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Tetrachloroethene	0.0041	0.0010	mg/l	8260B	06/15/12	1
Toluene	BDL	0.0050	mg/l	8260B	06/15/12	ī
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1.2.4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1, 1, 2-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
Trichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	06/15/12	ī
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1, 2, 3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī.
	BDL	0.0010	mg/1	8260B	06/15/12	ī
Vinyl chloride	BDL	0.0030	mg/l	8260B	06/15/12	ĩ.
Xylenes, Total	שטם	0.0050	g/		,,	-
Surrogate Recovery	95.9		% Rec.	8260B	06/15/12	1

Toluene-d8 Dibromofluoromethane

4-Bromofluorobenzene

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:

note: The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

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Reported: 06/18/12 14:32 Printed: 06/18/12 14:33

06/15/12 06/15/12

06/15/12

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Tax I.D. 62-0814289

L580392-05

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

ESC Sample # :

Site ID :

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received : June 14, 2012 Description : Well Sampling-Kings

Sample ID

: MW-11 CENTER

Project # : 23107012

Collected By : Collection Date : Paul MIllet 06/13/12 09:05

Parameter	Result	Det. Limit	Units	Method	Date	D11
Volatile Organics						
Acetone	BDL	0.050	mq/l	8260B	06/15/12	1
Acrolein	BDL	0.050	mg/1	8260B	06/15/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	06/15/12	-1
Benzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromodichloromethane	BOL	0.0010	mg/l	8260B	06/15/12	1
Bromoform	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromomethane	BDL	0.0050	mg/1	8260B	06/15/12	1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
sec-Butylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	06/15/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Chloroethane	BDL	0.0050	mq/l	8260B	06/15/12	ī
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	06/15/12	1
Chloroform	BDL	0.0050	mg/l	8260B	06/15/12	ī
Chloromethane	BDL	0.0025	mq/l	8260B	06/15/12	ī
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	06/15/12	ī
4-Chlorotoluene	BDL	0.0010	mq/l	8260B	06/15/12	ī
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mq/l	8260B	06/15/12	ī
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	06/15/12	ï
Dibromomethane	BDL	0.0010	mq/l	8260B	06/15/12	ī
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,3-Dichlorobenzene	BDL	0.0010	mg/l	B260B	06/15/12	ī
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ĩ
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	ī
1.1-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,2-Dichloroethane	BDL	0.0010	mg/1	8260B	06/15/12	ī
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ī
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ī
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,2-Dichloropropane	BDL	0.0010	mq/l	8260B	06/15/12	ī
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,3-Dichloropropane	BDL	0.0010	mg/1	8260B	06/15/12	ī
cis-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B	06/15/12	ī
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	ī
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	î
Di-isopropyl sther	BDL	0.0010	mg/1	8260B	06/15/12	ī
Ethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
Hexachloro-1.3-butadiene	BDL	0.0010	mg/1	8260B	06/15/12	1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	i
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	06/15/12	î,

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Page 10 of 13



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Tax I.D. 62-0814289

Est. 1970

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REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received Description

June 14, 2012 Well Sampling-Kings

ESC Sample # : L580392-05

Sample ID

MW-11 CENTER

Site ID :

Collected By : Collection Date :

Paul MIllet 06/13/12 09:05

Project # : 23107012

arameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	06/15/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Naphthalene	BDL	0.0050	mg/1	8260B	06/15/12	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1 4.
Styrene	BDL	0.0010	mg/l	8260B	06/15/12	1 :
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/1	8260B	06/15/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/1	8260B	06/15/12	1
1.1.2-Trichlorotrifluoroethane	BDL	0.0010	mg/1	8260B	06/15/12	1
Tetrachloroethene	0.014	0.0010	mg/1	8260B	06/15/12	1
Toluene	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1.2.4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1.1.2-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	06/15/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l -	8260B	06/15/12	.1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	06/15/12	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	06/15/12	1
urrogate Recovery			J. =			
Toluene-d8	93.2		& Rec.	8260B	06/15/12	1
Dibromofluoromethane	101.		% Rec.	8260B	06/15/12	
4-Bromofluorobenzene	101.		% Rec.	8260B	06/15/12	1 1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:
The reported analytical results relate only to the sample submitted.
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Tax I.D. 62-0814289

L580392-06

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received : Description :

June 14, 2012 Well Sampling-Kings

ESC Sample # : Site ID :

Sample ID

MW-11 DEEP

Project # : 23107012

Collected By : Collection Date : Paul MIllet 06/13/12 09:10

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Parameter		Det. Limit_	Units	Method	Date	Dil.
Volatile Organics	= .					*J=-1 G
Acetone	BDL	0.050	mq/l	8260B	06/15/12	1
Acrolein	BDL	0.050	mg/l	8260B	06/15/12	1
Acrylonitrile	BDL	0.010	mg/1	8260B	06/15/12	1
Benzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromoform	BDL	0.0010	mg/l	8260B	06/15/12	1
Bromomethane	BDL	0.0050	mg/l	8260B	06/15/12	1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
sec-Butylbenzene	BDL	0.0010	mq/l	8260B	06/15/12	ī
tert-Butylbenzene	BDL	0.0010	mq/l	8260B	06/15/12	1
Carbon tetrachloride	BDL.	0.0010	mq/l	8260B	06/15/12	ī
Chlorobenzene	BDL	0.0010	mq/l	8260B	06/15/12	ī
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
Chloroethane	BDL.	0.0050	mg/l	8260B	06/15/12	ī
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	06/15/12	ī
Chloroform	BDL	0.0050	mq/l	826DB	06/15/12	ī
Chloromethane	BDL	0.0025	mq/l	8260B	06/15/12	ī
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	06/15/12	ī
4-Chlorotoluene	BDL	0.0010	mq/1	8260B	06/15/12	ī
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/1	8260B	06/15/12	ī
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	06/15/12	î
Dibromomethane	BDL	0.0010	mg/1	8260B	06/15/12	ī
1.2-Dichlorobenzene	BDL	0.0010	mg/i	8260B	06/15/12	ī
1.3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,4-Dichlorobenzene	BDL	0.0010	mg/1	8260B	06/15/12	ī
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	ī
1,1-Dichloroethane	BDL	0.0010	mg/1	8260B	06/15/12	ī
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	ī
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ī
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	06/15/12	ī
trans-1,2-Dichloroethene	BDL	0.0010	mq/l	8260B	06/15/12	î
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	i
1,1-Dichloropropene	BDL	0.0010	mq/l	8260B	06/15/12	i
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	î
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	ī
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	06/15/12	i .
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	06/15/12	i ·
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	06/15/12	î
Ethylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	i
Hexachloro-1,3-butadiene	BDL	0.0010	mg/1	8260B	06/15/12	i
Isopropylbenzene	BDL	0.0010	mg/1	8260B	06/15/12	i
p-Isopropyltoluene	BDL.	0.0010	mg/1	8260B	06/15/12	i
b-rachrohitrorgage	DUB.		mg/ I	02000	30/13/12	• :

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

June 18, 2012

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L580392-06

Date Received 1 June 14, 2012 Well Sampling-Kings

Site ID :

Sample ID

MN-11 DEEP

Collected By 2 Collection Date 2 Paul MIllet 06/13/12 09:10 Project # : 23107012

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	06/15/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	06/15/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	06/15/12	1
Naphthalene	BDL	0:0050	mg/l	8260B	06/15/12	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Styrene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1,2-Tetrachloroethane	BOL	0.0010	mg/l	8260B	06/15/12	1
1,1,2,2-Tetrachloroethane	BDL.	0.0010	mg/1	8260B	06/15/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Tetrachloroethene	0.012	0.0010	mg/l	8260B	06/15/12	1
Toluene	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	06/15/12	1
Trichloroethene	BDL	0.0010	mg/1	8260B	06/15/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	06/15/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	06/15/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1, 2, 3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	06/15/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	06/15/12	1
Xylenes, Total	BDL .	0.0030	mg/l	8260B	06/15/12	1
Surrogate Recovery		2,2 ****		··· - -		
Toluene-d8	94.5		% Rec.	8260B	06/15/12	1
Dibromofluoromethane	98.9		% Rec.	8260B	06/15/12	ī
4-Bromofluorobenzene	108.	•	% Rec.	8260B	06/15/12	ī

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)
Note:

The reported analytical results relate only to the sample submitted.

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Reported: 06/18/12 14:32 Printed: 06/18/12 14:33

Company Name/Address:		Billing Information	on:	- A	nalvsis/Con	tainer/Preservative	C065	Chain of Custody Page of
Terracon - Colorado	Springs							
		Accounts P	ayable er Park Drive	and the same of	1200		mad T	M&
4172 Center Park Drive								EPA #COD981541436 M&E 1.3 M&E 1.3 Abanon Road iet, TN 37122
Colorado Springs.CO 809	16	Colorado S	Springs,CO 80916		1		LAND SH	C-1-E-N-C-E-S
			V 1					ebanon Road 51
Report to: ALL MILLET		Email to:		.Cawica				800) 767-5859
Project Description: WEU SAMPUN			SPRGS, CO	-1				615) 758-5858 615) 758-5859
1127007	Cilent Project #: 2_3107012	ESC Key:		0				
1/191597-2117		D C #.					L580	392
1 AMLMILLE	Site/Facility ID#:	P.O.#:		00			000000000000000000000000000000000000000	GSCO_((ab lise only)
Collected by (signature);	Rush? (Lab MUST	Be Notified)	Date Results Needer				Template/Prelogi	是一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个
1'x K Muce	Next Day	100%	Emeil? No Mee	of S				
Immediately Packed on Ice N Y		50%	FAX?NoYes	Cntrs			Shipped Via	
Sample ID	Comp/Grab Matr		Date Time				Remarks/Contaminan	Sample # (lab only)
MW-4	GRAD GU	J	413/12 165	522			NEED 56	冷静 张 雅
MW-8	GRAB G		4/3/12 1640	2		The state of the s	THE AT	_/
MW-10	GRAB G	4	6/13/12 097	024			MOST!	-03
MW-11 (SHALLOW)	GRAB CO		6/13/12 090	N 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2				
MW-11 (CENTER)	GRAB GU		6/13/12 090	P. Maria Service	/			9/5
MW-11 (DEEP)	GRAB GI	2 _	6/13/12/091	021				
			, ,					
						强 体		是是是持续的
*Matrix: SS - Soil/Solid GW - Ground	dwater WW - WasteW	ater DW - Drinkin	g Water OT - Other			p	Н	Temp
Remarks:				7590 V	18 84	19 F	low	Other
Relinguished bir://Signature)	Date: /	Time: Recei	ived by: (Signature)	1000	Samp	JO F Siles returned via: UPS dEx Courier C	Condition 3	
1XKN WILL		1700			De rec	DX Country D		1 Gich
Relinquished by: (Signature)	Date:	Time: Recei	ived by: (Signature)		tem	7 /2	CoC Scals in us	
Relinquished by: (Signature)	Date:	Time: Rec	eived for lab by: (Signa	ure) [Q]	Date	Mary Time	pH Checked	
*		1	1 Duly		0-1	4人	2000年1月1日中华12年2日日	報が開放 (表) (1)次前の時間のでない。 (2) (2) (2) (2) (2) (2) (2) (2) (2) (2)

February 22, 2013



Mr. Carl Spreng
Colorado Department of Public Health and Environment
HMWMD-HW-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3358

Email: carl.spreng@state.co.us

Re: King's One Hour Cleaners

3217 South Academy Boulevard Colorado Springs, Colorado Terracon Project No. 23107012

Dear Mr. Spreng;

On behalf of New Mission, LLC, Terracon Consultants, Inc. (Terracon) is providing the results of groundwater sampling performed in general accordance with your letter dated November 26, 2012. The general location of the King's One Hour Cleaners site is shown on the attached Figure 1.

On December 28, 2012, Terracon collected groundwater samples from "near off-site" wells MW-10 and MW-11, and downgradient (off-site) wells TM-10, TM-16, WSP-6 and WSP-7D. The approximate locations of these wells are shown on Figure 2. These wells were selected by Colorado Department of Public Health and Environment (CDPHE) for sampling because tetrachloroethylene (PCE) was detected at concentrations above the USEPA Maximum Contaminant Level (MCL) of 5 micrograms per liter (µg/l) in groundwater samples previously collected from these wells. Per CDPHE guidance, groundwater samples were collected from each well at approximately mid-depth in the observed water column using Hydra Sleeve samplers.

Recent and historic sample results for PCE for selected wells, including the Security Water District well S-14, are summarized in the table below. The laboratory's report for the groundwater sampling performed in December 2012 is attached.



Terracon Consultants, Inc. 4172 Center Park Drive Colorado Springs, CO 80916 P [719] 597 2116 F [719] 597 2117 terracon.com



Sample Location	PCE Results (μg/l)								
	12/28/12	6/13/12	12/27-29/11	11/5/09*	6/15/09*	03/16/09*			
MW-10	5.7	7.2	4.7						
MW-11 (mid depth)	7.6	14	4.7						
TM-10	1.7				1.9	1.9			
TM-16	4.1				3.0	3.6			
WSP-6	8.9				4.6	4.5			
WSP-7D	6.9			1.6					
S-14	6.2**	6.9**	5.2**	5.6**	2.7**	5.5**			

^{*} Samples resulted reported by CDPHE

As requested, Terracon estimated the groundwater travel time between the Security Water District Supply Well S-14 and the site. Data used for the estimate included information published by the U.S. Geological Survey¹ and grain size analyses of a soil sample collected from the aquifer at well MW-11. The distance between the site and S-14 is approximately 6,000 feet.

The site lies near the northeast boundary of the Widefield Aquifer (USGS, 1985). The hydraulic gradient calculated between well MW-2 (located on the site) and S-14 is 0.012. The porosity of the aquifer materials is assumed to be 0.30.

The Kozeny-Carman equation² was used to estimate the site-specific hydraulic conductivity of the aquifer using grain size and distribution analysis of a soil sample collected from within the aquifer at well MW-11. The hydraulic conductivity using this method was calculated to be 7.9 x 10⁻³ cm/sec (22 feet per day). Using this calculated value, the groundwater flow rate near the site is estimated to be on the order of 1 foot per day. The calculated groundwater travel time between the site and S-14 is approximately 6,000 days (16 years).

² Groundwater Software.com, Estimating Hydraulic Conductivity from Grain Size Analysis using the Kozeny-Carman method, September 2006

^{**} Same month samples resulted reported by CDPHE

⁻⁻ Not sampled

¹ U.S. Geological Survey (USGS), 1985. Sources of Water and Nitrogen to the Widefield Aquifer. Water Resources Investigation Report 85-4162. Lakewood, Colorado

EPA #COD981541436
M&E 1.3
Groundwater Sampling Results
King's One Hour Cleaners ■ Colorado Springs, CO
February 22, 2013 ■ Terracon Project No. 23107012



Please do not hesitate to contact us should you have any questions or require additional information.

Respectfully submitted,

Terracon Consultants, Inc.

Paul R. Millet, P.E., CHMM

Project Environmental Engineer

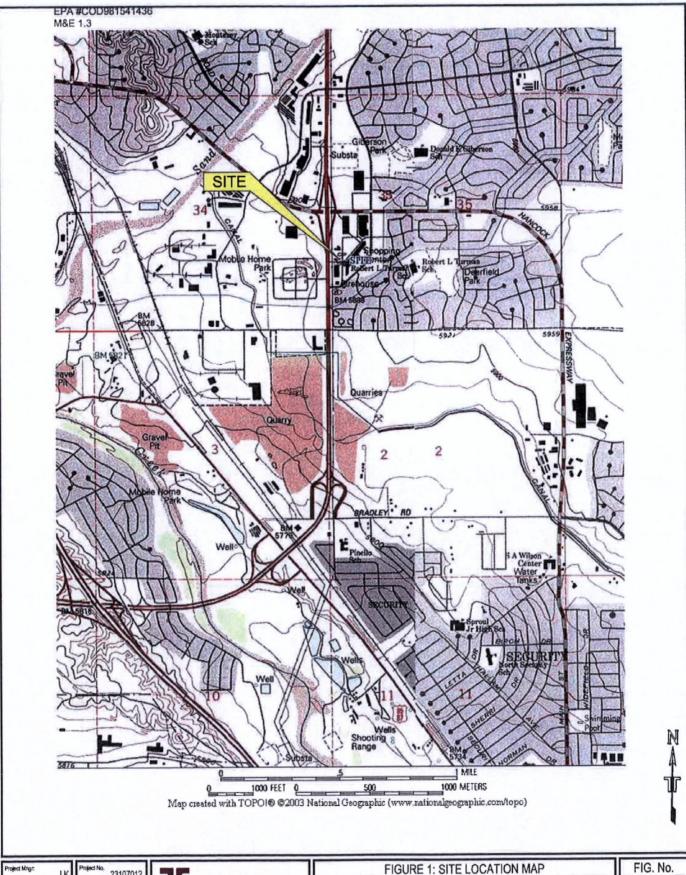
Lawrence R. Keefe

Principal | Office Manager

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Attachments

c. Matt Craddock – New Mission, LLC
Connie H. King – Law Firm of Connie H. King, LLC
Alison J. Thayer - Temkin Wielga & Hardt LLP



Project Mngr.	LK	Project No. 23107012
Drawn By:	DJS	Scale: AS NOTED
Checked By:	LK	Date: 08/20/2010
Approved By:	LK	

Terr	OCON
4172 Center Park Dr.	Colorado Springs, CO 80916
PH. (719) 597-2116	FAX. (719) 597-2117

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	KINGS DRY CLEANER
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	3217 S. ACADEMY BLVD.

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Consulting Engineers and Scientists

4172 Center Park Dr. Colorado Springs, CO 80918
PH: (719) 597-2116

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Filo No.

01/14/13

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12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Report Summary

Wednesday January 02, 2013

Report Number: L613456 Samples Received: 12/29/12 Client Project: 23107012

Description: Kings

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Daphne Richards , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197, FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704/BIO041, ND - R-140. NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1, TX - T104704245-11-3, OK - 9915, PA - 68-02979, IA Lab #364

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Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

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Est. 1970

REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

December 29, 2012

Date Received :

Kings

TM-10

Sample ID

Collected By : Collection Date :

Paul Millet 12/28/12 09:43

Site ID :

Project #: 23107012

ESC Sample # : L613456-01

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Volatile Organics				- 1- main aphinimina a		
Acetone	BDL	0 .050	mg/l	8260B	12/31/12	1
Acrolein	BDL	0.050	mg/l	82,60B	12/31/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	12/31/12	1
Benzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromobenzene	BDL	0.0010		82,60B	12/31/12	1
Bromodichloromethane	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1
Bromoform	$\mathtt{BD}\mathbf{L}$	0 .0010	mg/l	8260B	12/31/12	1
Bromomethane	BDL	0 .0050	mg/l	8260B	12/31/12	1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
sec-Butylbenzene	BDL	0 .0010	mg/l	8260B	12/31/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Chlorodibromomethane	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1
Chloroethane	\mathtt{BDL}	0.0050	mg/l	8260B	12/31/12	1
2-Chloroethyl vinyl ether	BDL	0 .050	mg/l	8260B	12/31/12	1
Chloroform	BDL	0 .0050	mg/l	8260B	12/31/12	1
Chloromethane	BDL	0 .0025	mg/l	8260B	12/31/12	1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	12/31/12	1
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	12/31/12	1.
1,2-Dibromo-3-Chloropropane	BDL	0 .0050	mq/l	8260B	12/31/12	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Dibromomethane	BDL	0.0010	mq/l	8260B	12/31/12	1
1,2-Dichlorobenzene	BDL	0.0010	mq/l	8260B	12/31/12	1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1.4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	1
1,1-Dichloroethane	BDL	0.0010	mg/1	8260B	12/31/12	1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1.1-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
trans-1,2-Dichloroethene	BDL	0.0010	mq/l	8260B	12/31/12	1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12	1
trans-1,3-Dichloropropene	BDL	0.0010	mq/1	8260B	12/31/12	ī
2,2-Dichloropropane	BDL	0 .0010	mg/l	8260B	12/31/12	ī
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	12/31/12	ī
Ethylbenzene	BDL	0.0010	mg/1	8260B	12/31/12	ī
Hexachloro-1,3-butadiene	BDL	0.0010	mg/1	8260B	12/31/12	ī
Isopropylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	î
	BDL	0.0010	mg/1	8260B	12/31/12	. 1
p-Isopropyltoluene	מעם	9.0010	mg/ I	02002	22,01,12	-



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Tax I.D. 62-0814289

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REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L613456-01

Date Received : December 29, 2012

Description Kings

Site ID :

Sample ID

TM-10

Project #: 23107012

Collected By Collection Date Paul Millet 12/28/12 09:43

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0::010	mg/l	8260B	12/31/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	12/31/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0:010	mg/l	8260B	12/31/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	12/31/12	1
Naphthalene	BDL	0.0050	mq/l	:8260B	12/31/12	1
n-Propylbenzene	BDL	0 a 0 0 1 0	mg/l	8260B	12/31/12	1
Styrene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1 ¹ 1
1,1,2,2-Tetrachloroethane	BDL	0:0010	mg/1	8260B	12/31/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Tetrachloroethene	0.0017	0:0010	mg/l	8260B	12/31/12	1
Toluene	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,2,4-Trichlorobenzene	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1 1 1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Trichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2,3-Trichloropropane	\mathtt{BDL}	0.0025	mg/l	8260B	12/31/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	12/31/12	1
Surrogate Recovery						
Toluene-d8	100.		% Rec.	8260B	12/31/12	1
Dibromofluoromethane	98.8		% Rec.	8260B	12/31/12	1
4-Bromofluorobenzene	102.		% Rec.	8260B	12/31/12	1

Det. Limit - Practical Quantitation Limit(PQL) Note:

The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

December 29, 2012

Date Received : Description :

Kings

TM-16

Sample ID

Collected By Collection Date

Paul Millet 12/28/12 09:59

Site ID :

Project # :

23107012

ESC Sample # : L613456-02

Parameter	Result	Det. Limit	Units	Method	Date Dil.
Volatile Organics				-	
Acetone	BDL	0.050	mg/l	8260B	12/31/12 1
Acrolein	BDL	0.050	mg/l	8260B	12/31/12 1
Acrylonitrile	BDL	0.010	mg/l	8260B	12/31/12 1
Benzene	BDL	0.0010	mg/l	8260B	12/31/12 1
Bromobenzene	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12 1
Bromodichloromethane	BDL	0.0010	mg/l	82.60B	12/31/12 1
Bromoform	BDL	0.0010	mg/l	8260B	12/31/12 1
Bromomethane	BDL	0.0050	mg/l	8260B	12/31/12 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12 1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12 1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	12/31/12 1
Chlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12 1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	12/31/12 1
Chloroethane	BDL	0.0050	mg/l	8260B	12/31/12 1
2-Chloroethyl vinyl ether	BDL	0.050	mq/l	8260B	12/31/12 1
Chloroform	BDL	0.0050	mg/l	8260B	12/31/12 1
Chloromethane	BDL	0.0025	mq/1	8260B	12/31/12 1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	12/31/12 1
4-Chlorotoluene	BDL	0.0010	mq/l	8260B	12/31/12 1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	ma/l	8260B	12/31/12 1
1,2-Dibromoethane	BDL	0.0010	mg/1	8260B	12/31/12 1
Dibromomethane	BDL	0.0010	mg/l	8260B	12/31/12 1
1,2-Dichlorobenzene	BDL	0.0010	mq/l	8260B	12/31/12 1
1,3-Dichlorobenzene	BDL	0.0010	mq/1	8260B	12/31/12 1
1,4-Dichlorobenzene	BDL	0.0010	mq/l	8260B	12/31/12 1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	12/31/12 1
1,1-Dichloroethane	BDL	0.0010	mq/l	8260B	12/31/12 1
1.2-Dichloroethane	BDL	0.0010	mg/1	8260B	12/31/12 1
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12 1
cis-1,2-Dichloroethene	BDL	0.0010	mq/l	8260B	12/31/12 1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12 1
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12 1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12 1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12 1
trans-1,3-Dichloropropene	BDL	0:0010	mq/1	8260B	12/31/12 1
2,2-Dichloropropane	BDL	0:0010	mq/l	8260B	12/31/12 1
Di-isopropyl ether	BDL	020010	mg/l	8260B	12/31/12 1
Ethylbenzene	BDL	0:0010	mg/l	8260B	12/31/12 1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	12/31/12 1
Isopropylbenzene	BDL	0.0010	mg/1	8260B	12/31/12 1
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	12/31/12 1
b-raobroblicordene	ninn.	0.0010	g, ±		



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REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L613456-02

Date Received

December 29, 2012

Kings

Sample ID

TM-16

Collected By : Paul Millet Collection Date : 12/28/12 09:59

Site ID :

Project #: 23107012

arameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	12/31/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	12/31/12	1
4-Methyl-2-pentanone (MIBK)	\mathtt{BDL}	0.010	mg/l	8260B	12/31/12	1
Methyl tert-butyl ether	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1
Naphthalene	BDL	0.0050	mg/l	8260B	12/31/12	1:
n-Propylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Styrene	BDL.	0.0010	mg/l	8260B	12/31/12	1
1,1,1,2-Tetrachloroethane	BD L	0.0010	mg/l	8260B	12/31/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/1	8260B	12/31/12	1
Tetrachloroethene	0.0041	0.0010	mg/l	8260B	12/31/12	1
Toluene	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2,3-Trichlorobenzene	BDL	0:.0010	mg/l	8260B	12/31/12	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Trichloroethene	BDL	0.0010	mg/1	8260B	12/31/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	12/31/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	82,60B	12/31/12	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	12/31/12	1
urrogate Recovery						
Toluene-d8	100.	•	% Rec.	8260B	12/31/12	1
Dibromofluoromethane	95.1		% Rec.	8260B	12/31/12	1
4-Bromofluorobenzene	99.2		% Rec.	8260B	12/31/12	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

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Tax: I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

January 02, 2013

Date Received : Description :

ESC Sample # : L613456-03

December 29, 2012 Neco.... Kings

Site ID :

Sample ID

: WSP-6

Project # : 23107012

Collected By : Paul Millet Collection Date : 12/28/12 10:12

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Volatile Organics			• •		•	
Acetone	BDL	0.050	mg/l	8260B	12/31/12	1
Acrolein	BDL	0.050	mg/l	8260B	12/31/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	12/31/12	1
Benzene	BDL	0.0010	mq/l	8260B	12/31/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromoform	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromomethane	BDL	0.0050	mq/l	8260B	12/31/12	ો
n-Butylbenzene	BDL	0.0010	mq/l	8260B	12/31/12	
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	î
Chlorodibromomethane	BDL	0.0010	mq/1	8260B	12/31/12	ī
Chloroethane	BDL	0.0050	mg/l	8260B	12/31/12	ां
2-Chloroethyl vinyl ether	BDL	0.050	mg/1	8260B	12/31/12	ī
Chloroform	BDL	0.0050	mg/l	8260B	12/31/12	Ĩ
Chloromethane	BDL	0.0025	mg/l	8260B	12/31/12	1 1
2-Chlorotoluene	BDL	0.0010	mq/l	8260B	12/31/12	i,
4-Chlorotoluene	BDL BDL	0.0010	mg/l	8260B	12/31/12	î
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/1	8260B	12/31/12	ī
1,2-Dibromoethane	BDL	0.0010	mg/1	8260B	12/31/12	1
Dibromomethane	BDL	0.0010	mg/l	8260B	12/31/12	
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3-Dichlorobenzene	BDL	0.0010	mg/1	8260B	12/31/12	1
1,4-Dichlorobenzene	BDL	0.0010	mg/1	8260B	12/31/12	2.4. 3.6
Dichlorodifluoromethane	BDL	0.0010	mg/1	8260B	12/31/12	1
	BDL	0.0010		8260B	12/31/12	- \$
1,1-Dichloroethane		0.0010	mg/1	8260B		4
1,2-Dichloroethane	BDL		mg/l	8260B 8260B	12/31/12	1
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l		12/31/12	1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3-Dichloropropane	BDL	0.0010	mg/1	8260B	12/31/12	
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12	1
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12	1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	12/31/12	i ;
Ethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Hexachloro-1,3-butadiene	BDL.	0,0010	mg/l	8260B	12/31/12	1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	î î
p-Isopropyltoluene	BDL	0.0010	mg/1	8260B	12/31/12	•



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REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # :

L613456-03

Date Received - 4 Description

December 29, 2012 .2

Kings

Site ID :

Sample ID

WSP-6

Project # : 23107012

Collected By : Collection Date :

Paul Millet 12/28/12 10:12

Dila Units Method Date Result Det. Limit Parameter 2-Butanone (MEK) Methylene Chloride BDL 0.010 mq/18260B 12/31/12 BDL 0.0050 mg/18260B 12/31/12 1 4-Methyl-2-pentanone (MIBK) Methyl tert-butyl ether BDL 0.010 mg/l8260B 12/31/12 12/31/12 0.0010 0.0050 0.0010 BDL mg/l 8260B 1 8260B 12/31/12 Naphthalene mg/1BDL 8260B 12/31/12 BDL mg/1n-Propylbenzene 8260B 12/31/12 Styrene 1,1,1,2-Tetrachloroethane 1,1,2,2-Tetrachloroethane BDL 0.0010 mg/1mg/l BDL 0.0010 8260B 12/31/12 BDL 0.0010 mg/18260B 8260B 12/31/12 12/31/12 1,1,2-Trichlorotrifluoroethane BDL 0.0010 mg/18260B 12/31/12 0.0010 0.0089 mg/1Tetrachloroethene BDL 0.0050 mg/1 8260B 12/31/12 Toluene 1,2,3-Trichlorobenzene 0.0010 mg/l 8260B 12/31/12 BDL mg/l 8260B 8260B 12/31/12 12/31/12 1,2,4-Trichlorobenzene BDL 0.0010 1,1,1-Trichloroethane BDL 0.0010 mg/18260B 12/31/12 mg/l 1,1,2-Trichloroethane BOL 0.0010 Trichloroethene Trichlorofluoromethane 8260B 12/31/12 0.0010 BDL mg/1 0.0050 mg/l 8260B 12/31/12 BDL mg/l 1,2,3-Trichloropropane 0.0025 8260B 12/31/12 1,2,4-Trimethylbenzene BDL 0.0010 mg/18260B 12/31/12 8260B 12/31/12 1,2,3-Trimethylbenzene 0.0010 mg/1BDL mg/18260B 0.0010 12/31/12 1,3,5-Trimethylbenzene BDL Vinyl chloride Xylenes, Total Surrogate Recovery BDL 0.0010 mg/l 8260B 12/31/12 0.0030 mg/18260B 12/31/12 1 BDL 8260B 12/31/12 % Rec. Toluene-d8 98.4 8260B 12/31/12 Dibromofluoromethane % Rec. 99.8 % Rec. 4-Bromofluorobenzene

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit(PQL)

Note:

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

Reported: 01/02/13 10:00 Printed: 01/02/13 10:08



12065 Lebanon Rd. 12003 Lepanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 197.0

REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L613456-04

Date Received Pescription Description

December 29, 2012

Kings

Site ID :

Sample ID

WSP-7D

Project # : 23107012

Collected By : Collection Date :

Paul Millet 12/28/12 10:25

arameter	Result	Det. Limit	Units.	Method	Date	Dil
olatile Organics					40 104 150	
Acetone	BDL	0.050	mg/l	8260B	12/31/12	1
Acrolein	BDL	0.050	mg/1	8260B	12/31/12	1
Acrylonitrile	\mathtt{BDL}	0.010	mg/l	8260B	12/31/12	1
Benzene	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1
Bromobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromoform	BDL	0.0010	mg/l	8260B	12/31/12	1
Bromomethane	BDL	0.0050	mg/l	8260B	12/31/12	1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Carbon tetrachloride	BDL	0.0010	mg/1	8260B	12/31/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Chloroethane	BDL	0.0050	mq/l	8260B	12/31/12	1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	12/31/12	1
Chloroform	BDL	0.0050	mq/l	8260B	12/31/12	1
Chloromethane	BDL	0.0025	mg/l	8260B	12/31/12	1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	12/31/12	1
4-Chlorotoluene	BDL	0.0010	mg/1	8260B	12/31/12	1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Dibromomethane	BDL		mq/1	8260B	12/31/12	1
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	1
1.1-Dichloroethane	BDL	0.0010	mq/1	8260B	12/31/12	ī
1,2-Dichloroethane	BDL \	0.0010	mg/l	8260B	12/31/12	ī
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	12/31/12	ī
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	ĩ
	BDL	0.0010	mq/l	8260B	12/31/12	ī
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	ī
cis-1,3-Dichloropropene		0.0010	mg/1	8260B	12/31/12	ī
trans-1,3-Dichloropropene	BDL BDL	0.0010	mq/1	8260B	12/31/12	1
2,2-Dichloropropane		0.0010	mg/1	8260B	12/31/12	ì
Di-isopropyl ether	BDL	0.0010	mg/1	8260B	12/31/12	ī
Ethylbenzene	BDL			8260B	12/31/12	i
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	12/31/12	1
Isopropylbenzene	BDL	0.0010	mg/1	8260B	12/31/12	1
p-Isopropyltoluene	BDL	0.0010	mg/l	0200B	12/31/12	1



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12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L613456-04

Date Received : Description

December 29, 2012

Site ID :

Kings

Sample ID

WSP-7D

Project #: 23107012

.

Collected By : Collection Date : Paul Millet 12/28/12 10:25

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	12/31/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	12/31/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	12/31/12	1
Methyl tert-butyl ether	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1
Naphthalene	BDL	0.0050	mg/l	8260B	12/31/12	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Styrene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Tetrachloroethene	0.0069	0.0010	mg/l	8260B	12/31/12	1.
Toluene	BDL	0.0050	mg/l	8260B	12/31/12	1
1.2.3-Trichlorobenzene	BDL	0.0010	mq/l	8260B	12/31/12	1
1,2,4-Trichlorobenzene	BDL	0.0010	mq/l	8260B	12/31/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Trichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/1	8260B	12/31/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	. 1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	12/31/12	1
Surrogate Recovery			J .	•		
Toluene-d8	98.6		% Re c∵	8260B	12/31/12	1 .
Dibromofluoromethane	101.		% Rec.	8260B	12/31/12	1
4-Bromofluorobenzene	96.0		% Rec.	8260B	12/31/12	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

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Reported: 01/02/13 10:00 Printed: 01/02/13 10:08

EPA#COD981541436 M&E 1.3



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Tax I.D. 62-0814289

Est. 1970

ESC Sample # : L613456-05

Project #: 23107012

REPORT OF ANALYSIS

January 02, 2013

Site ID :

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

December 29, 2012

Date Received Description Kings

Sample ID

Collected By : Collection Date : Paul Millet 12/28/12 10:45

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Volatile Organics						
Acetone	\mathtt{BDL}	0.050	mg/1	8260B	12/31/12	1
Acrolein	BDL	0.050	mg/1	8260B	12/31/12	1
Acrylonitrile	BDL	0.010	mg/l	8260B	12/31/12	1
Benzene	BDL	0,0010	mg/l	8260B	12/31/12	1. 1. 1. 1. 1.
Bromobenzene	BDL	0,0010	mg/l	8260B	12/31/12	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	12/31/12	1,
Bromoform	BDL	0].0010	mg/l	8260B	12/31/12	.1
Bromomethane	BDL	0.0050	mg/l	8260B	12/31/12	1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1 1 1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Chlorobenzene	BDL	0 .0010	mg/l	8260B	12/31/12	
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	12/31/12	1.
Chloroethane	BDL	0:.0050	mg/l	8260B	12/31/12	1
2-Chloroethyl vinyl ether	BDL	0.050	mg/1	8260B	12/31/12	Ĩ.
Chloroform	BDL	0.0050	mg/l	8260B	12/31/12	1
Chloromethane	BDL	0.0025	mg/1	8260B	12/31/12	1
2-Chlorotoluene	BDL	0.0010	mq/l	8260B	12/31/12	1
4-Chlorotoluene	BDL	0.0010	mg/1	8260B	12/31/12	1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	12/31/12	1
1.2-Dibromoethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Dibromomethane	BDL	0.0010	mg/l	8260B	12/31/12	î.
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	î.
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1.4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	ī
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	ī
1,1-Dichloroethane	BDL	0.0010	mq/l	8260B	12/31/12	1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	'ī'.
1,1-Dichloroethene	BDL	0.0010	mq/1	8260B	12/31/12	· 📆
	BDL	0.0010	mg/1	8260B	12/31/12	3
cis-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	12/31/12	
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	î.
1,2-Dichloropropane	BDL	0.0010	mg/1	8260B	12/31/12	i
1,1-Dichloropropene	BDL	0.0010	mg/1	8260B	12/31/12	Ť.
1,3-Dichloropropane		0.0010		8260B	12/31/12	3
cis-1,3-Dichloropropene	BDL		mg/1	8260B	12/31/12	3
trans-1,3-Dichloropropene	BDL	0.0010	mg/1		12/31/12	†
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	12/31/12	1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B		1
Ethylbenzene	BDL	0.0010	mg/1	8260B	12/31/12	1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	12/31/12	i
Isopropylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	
p-Isopropyltoluene	BDL	0,0010	mg/l	8260B	12/31/12	1



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Tax I.D. 62-0814289

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REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L613456-05

Date Received : Description :

December 29, 2012

Kings

Sample ID

MW-11

Collected By : Collection Date :

Paul Millet 12/28/12 10:45

Site ID :

Project # : 23107012

Parameter	Result	Det. Limit	Units	Method	Date	Dil
2-Butanone (MEK)	BDL	0.010	mq/l	8260B	12/31/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	12/31/12	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	12/31/12	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	12/31/12	1
Naphthalene	BDL	0.0050	mg/l	8260B	12/31/12	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Styrene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/1	8260B	12/31/12	1
Tetrachloroethene	0.0076	0.0010	mg/l	8260B	12/31/12	1
Toluene	BDL	0.0050	mg/l	8260B	12/31/12	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,2,4-Trichlorobenzene	BDL .	0.0010	mg/l	8260B	12/31/12	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	1
Trichloroethene	\mathtt{BDL}	0.0010	mg/l	8260B	12/31/12	1
Trichlorofluoromethane	BDL	0.0050	mq/l	8260B	12/31/12	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	12/31/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	12/31/12	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	12/31/12	1
Surrogate Recovery			٠.			
Toluene-d8	99.3		% Rec.	8260B	12/31/12	1
Dibromofluoromethane	98.6		% Rec.	8260B	12/31/12	1
4-Bromofluorobenzene	97.5		% Rec.	8260B	12/31/12	1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)

Note:

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

Reported: 01/02/13 10:00 Printed: 01/02/13 10:08

EPA #COD981541436 M&E 1.3



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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

December 29, 2012

Date Received : Description : Kings

MW-10

Sample ID

Collected By : Collection Date :

Paul Millet 12/28/12 10:59

Site ID :

Project # : 23107012

ESC Sample # : L613456-06

Parameter	Result -	Det. Limit	Units	Method		Date	Dil.
Volatile Organics							_
Acetone	\mathtt{BDL}	0.050	mg/l	8260B		12/31/12	1
Acrolein	BDL	0.050	mg/1	8260B		12/31/12	1
Acrylonitrile	\mathtt{BDL}	0.010	mg/l	8260B		12/31/12	1
Benzene	BDL	0.0010	mg/l	8260B		12/31/12	1
Bromobenzene	\mathtt{BDL}	0.0010	mg/l	8260B		12/31/12	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B		12/31/12	1
Bromoform	BDL	0.0010	mg/l	8260B		12/31/12	1
Bromomethane	BDL	0.0050	mg/l	8260B		12/31/12	1
n-Butylbenzene	BDL	0.,0010	mg/l	8260B		12/31/12	1
sec-Butylbenzene	BDL	0,0010	mg/l	8260B		12/31/12	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B		12/31/12	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B		12/31/12	1
Chlorobenzene	BDL	0.0010	mg/l	8260B		12/31/12	1
Chlorodibromomethane	\mathtt{BDL}	0.0010	mg/l	8260B		12/31/12	1
Chloroethane	BDL	0.0050	mg/l	8260B		12/31/12	1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B		12/31/12	1
Chloroform	BDL	0.0050	mg/l	8260B		12/31/12	1
Chloromethane	BDL	0.0025	mg/l	8260B		12/31/12	1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B		12/31/12	1
4-Chlorotoluene	\mathtt{BDL}	0.0010	mg/l	8260B		12/31/12	1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B		12/31/12	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B		12/31/12	1
Dibromomethane	BDL	0.0010	mg/l	8260B		12/31/12	1
1.2-Dichlorobenzene	BDL	0.0010	mg/l	8260B		12/31/12	1
1.3-Dichlorobenzene	BOL	0.0010	mg/l	8260B		12/31/12	1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	•	12/31/12	1
Dichlorodifluoromethane	BDL	0:0050	mg/l	8260B		12/31/12	1
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B		12/31/12	1
1.2-Dichloroethane	BDL	0.0010	mg/l	8260B		12/31/12	1
1.1-Dichloroethene	BDL.	0.0010	mg/l	8260B		12/31/12	1
cis-1,2-Dichloroethene	BDL	0.0010	mq/l	8260B		12/31/12	1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B		12/31/12	1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B		12/31/12	1
1,1-Dichloropropene	BDL	0.0010	mg/1	8260B		12/31/12	1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B		12/31/12	1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B		12/31/12	1
trans-1,3-Dichloropropene	BDL	0.0010	mq/l	8260B		12/31/12	1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B		12/31/12	1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B		12/31/12	1
Ethylbenzene	BDL	0.0010	mg/l	8260B		12/31/12	1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B		12/31/12	1
Isopropylbenzene	BDL	0.0010	mg/l	8260B		12/31/12	1
p-Isopropyltoluene	BDL	0.0010	mg/1	8260B		12/31/12	1
b. 190broblicornene	202	*******	3, -				



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Tax I.D. 62-0814289

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REPORT OF ANALYSIS

January 02, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

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ESC Sample # : L613456-06

Date Received :

December 29, 2012

Description

Kings

Sample ID

MW-10

Collected By Collection Date :

Paul Millet 12/28/12 10:59

23107012 Project # :

Site ID :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	12/31/12	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	12/31/12	ī
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	12/31/12	ī
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	12/31/12	ī
Naphthalene	BDL	0.0050	mq/l	8260B	12/31/12	ī
n-Propylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	ī
Styrene	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/1	8260B	12/31/12	ī
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	12/31/12	ī
Tetrachloroethene	0.0057	0.0010	mg/l	8260B	12/31/12	ī ·
Toluene	BDL	0.0050	mg/l	8260B	12/31/12	ī
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	ĩ
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	ī
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	12/31/12	ī
Trichloroethene	BDL	0.0010	mg/l	8260B	12/31/12	ï
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	12/31/12	ī
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	12/31/12	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1 1 1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	12/31/12	1
Vinyl chloride	BDL	0.0010	mq/l	8260B	12/31/12	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	12/31/12	1
Surrogate Recovery	222		····g/ –	*-*		
Toluene-d8	100.		& Reca	8260B	12/31/12	. 1
Dibromofluoromethane	100.		% Rec.	8260B	12/31/12	1
4-Bromofluorobenzene	97.0 '		% Rec.	8260B	12/31/12	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

Reported: 01/02/13 10:00 Printed: 01/02/13 10:08

EPA #COD981541436 M&E 1.3

Attachment A List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID Qualifier
<u> </u>	<u> </u>	<u> </u>		
L613456-01	WG630576 WG630576	SAMP SAMP	2-Chloroethyl vinyl ether trans-1,3-Dichloropropene	R2496320 J3 R2496320 J3

Attachment B Explanation of QC Qualifier Codes

Qualifier	Meaning
J3	The associated batch QC was outside the established quality control range for precision.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods, it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

Definitions

- Accuracy The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.
- Precision The agreement between a set of samples or between duplicate samples.

 Relates to how close together the results are and is represented by Relative Percent Difference.
- Surrogate Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.
- TIC Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Company Name/Address			Alternate B	Billing			25,425	Analysis/Con	tainer/Preser	vative	4	Chain of Cus	tody
Terracon Co Springs			Accounts	•								F021	EPA P
4172 Center Park dr. Colorado Springs, CO 809	046			nter Park Dr Springs Co				47%			Prepared by:		
			Report to:	Au Mul	LET	Com					ENVIRON Science cor 12065 Lebai Mt. Juliet TN	p non Road	COD981541436 1.3
KING	35						6017			26	Phone (615)		- 1
PHONE: (719)597-2116	Client Project	No. 0701	7	Lab Project #			걸			1	Phone (800 FAX (61) 767-5859 5)758-5859	- 1
FAX: (719) 597-2117 Collected by:	Site/Facility ID	-		P.O.#			Amb w/HCL		200		anni walani na manatan anni	0,700 0000	* × Udwala
MULMILLET	Site/Facility ID						Ami				CoCode	(lab use only)	100
Collected by (signature):	s	ab MUST b	200%		DAYTAT	-	(2) 40ml				TERRCSCO Template/Prelogin		
Baskad as las N. Val		lext Day wo Day			o Yes	of	2) 03		5.42	200	Shipped Via: Denver S	ervice Center	
Packed on Ice NY	Comp/Grab	Matrix*	Depth	Date	Time	Cntrs	V8260				Remarks/contaminant	Sample # (lab o	nlv)
TM-10	GRAB	GW	Deptil	12/28/12	094-3	2	x	77.02	1573	60000	L613 456	Cample # (rab o	-01
TM-16	GRAB	GW	-	14/28/12	0959	2	х	3.38		520 (544 (52 7 (5)	100750		-02
1.)6P-b	GRAB	GW	-	12/28/17	1012	2	х	100	2 (32)	1		A	- 03
WSP-7D	GRAB	GW	-	1422/12	1025	2	X	36	1.4				-04
$M\omega - 11$	GRAB	GW	-	12/28/12		2	х	200	100	3.27		Survivor Andrews Commercial Comme	-05
MW - 10	GRAB	GW	-	12/28/12	1059	2	X	400	200	200			-06
	14			1			100	Marin San	TOUR.				
							1700	製水	2.00				
							3.5	7		强制			
Matein SS Sail/Saild CIM County	-1 1484/14/-		NA Deieleie e	Weter OT O	46					-11	T		
Matrix: SS-Soil/Solid GW-Groundwa Remarks:	ater vvvv-vva	istewater L	DVV-Drinking	vvater 01-0	tner					pH Flow	Temp Other		
Reinquisher by:(\$ighetyhe)	Date	Time: 1600	Received by:	(Signature)	M.A			es returned via; l	-		Condition	(lab use only)	a)
Palacuistas burginas	Date: 17/28/12		D	/O:t	ځ <i>د</i> ک			413473			COCSI	ok ,	
Relinquisher by:(Signature	Date: /	Time:	Received by:	(Signature)	20		Temp:	3.10	Bottles Rec	ceived:			
Relinquisher by:(Signature	Date:	Time:	Received for	lab by: (Signature			Date:	120/12	Time:	开始的代	pH Checked:	NCF:	

£

- -

April 15, 2013



Mr. Carl Spreng
Colorado Department of Public Health and Environment
HMWMD-HW-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3358

Email: carl.spreng@state.co.us

Re: King's One Hour Cleaners

3217 South Academy Boulevard Colorado Springs, Colorado Terracon Project No. 23107012

Dear Mr. Spreng:

This letter provides Terracon Consultants, Inc. (Terracon) response to comments from the Security Water District (SWD) that were submitted to Colorado Department of Public Health and Environment (CDPHE) by SWD's consultant, Principia Mathematica ("PM"), on March 1, 2013. Principia Mathematica's comments were provided in response to Terracon's letter dated February 22, 2013 regarding an estimate of groundwater travel time in the vicinity of the King's One Hour Cleaners ("King's Cleaners or site") and the New Mission Shopping Center. Terracon would like to emphasize that our calculation of groundwater travel times was provided in response to CDPHE's specific request. Terracon's work was not intended to address whether any alleged release of PCE from King's Cleaners, or from any other source, has contributed to the PCE or other constituents observed in the Widefield Aquifer. As noted in previous correspondence, we have identified multiple potential sources for tetrachloroethylene (PCE) observed in the aquifer in the vicinity of SWD well S-14, including for example, the Schlage Lock site. In their letter, PM states that "The S-14 study never established the vertical interval where the PCE is coming from." Furthermore, PM states that "we have not been able to establish exactly what path the plume followed in either a horizontal or vertical extent...." These statements highlight the uncertainty of any effects of the historic operations at King's Cleaners to well S-14. Because PM's other comments provided in their March 1, 2013 letter might be misinterpreted, Terracon believes it is appropriate to address some of the specific points PM has raised:

Terracon agrees that calculating groundwater travel time involves uncertainty.
 Nevertheless, given the available data, our calculation of a 16 year travel time is reasonable, and consistent with the 3 to 70 year time estimate provided by PM.



Terracon Consultants, Inc. 4172 Center Park Drive Colorado Springs, CO 80916 P [719] 597 2116 F [719] 597 2117 terracon.com



- Our use of a 30% value for porosity is appropriate given the unconsolidated sandy nature of the Fountain Valley Alluvial sediment. On the contrary, a porosity value of 20% or lower as suggested by PM is more appropriate for consolidated/cemented materials, rather than the soils observed in the vicinity of the site. This is supported in the general geotechnical literature (e.g., Holtz and Kovacs, 1981).
- We agree that the most uncertain value in the travel time calculation is the hydraulic conductivity. However, as PM notes, our estimated value of hydraulic conductivity of 22 feet per day (ft/day) is reasonable and consistent with the range suggested by PM (5 ft/day to 100 ft/day).
- Terracon agrees that it is not just the hydraulic conductivity at the King's Cleaners that matters, but also the hydraulic conductivity along the entire alleged flow path. However, PM's response places a disproportionate emphasis on potential hydraulic conductivity values near S-14, located at the endpoint of the alleged flow path. Terracon's hydraulic conductivity estimate of 22 ft/day is based on direct sampling of aquifer materials at MW-11, which is located approximately 1,000 ft along the estimated 6,000 ft length of the alleged flow path. Principia Mathematica suggests that much higher hydraulic conductivities may be expected around S-14 and the Transit Mix site, but there is only limited data in the immediate vicinity of S-14 to substantiate that statement. Thus, Terracon's conductivity estimate is based on data collected from the alleged flow path, whereas PM's suggested range of 5 ft/day to 100 ft/day is possible, but is not based on empirical data.
- The estimated travel time of 16 years is more probable than the lower estimates offered by PM, particularly based on the available data which indicates that 22 ft/day is a reasonable estimate of hydraulic conductivity for the initial portion of the alleged flow path. Even assuming PM's suggested upper limit of 100 ft/day as an extreme case for the remaining portion of the alleged flow path, PM's lower-end estimates of the travel time are unlikely. For example, if the first 2,000 feet of the 6,000-foot path is assumed to have a hydraulic conductivity of 22 ft/day (which was based on the aquifer material samples obtained at MW-11), and the remaining 4,000 feet is assumed to have a hydraulic conductivity of 100 ft/day (based on PM's high-end estimate), then the equivalent hydraulic conductivity for the entire path length would be about 46 ft/day. This results in a travel time for the entire alleged flow path of about 9 years. In our opinion, PM's estimate of the travel time of "perhaps a year or two on the low end" is not substantiated by the available data and is considered unlikely.

It should be noted that neither Terracon's nor PM's estimates of travel time account for transport from the ground surface to the aquifer through the vadose zone, which is an important factor influencing overall groundwater travel time. Fluid transport in the vadose zone is generally slower than in the saturated zone due to reduced hydraulic conductivity and because confining

EPA ID #COD981541436
M&E 1.3
Response to Comments
King's One Hour Cleaners
Colorado Springs, CO
April 15, 2013
Terracon Project No. 23107012



layers may be encountered. Based on observed site geology, lower permeability silt and clay lenses overly the sandy water-bearing zone. As a result, estimates of travel time that account for flow through the vadose zone are likely to be longer. At the King's Cleaner site, depth to groundwater is greater than 80 feet below ground surface. Thus, it is likely that travel time through the vadose zone would increase the overall travel time for fluids moving from the site to well S-14.

In summary, it is our opinion that the estimated travel time of 16 years is reasonable and consistent with data collected in the alleged flow path and the vicinity of King's Cleaners.

Please do not hesitate to contact us should you have any questions or require additional information.

Respectfully submitted,

Terracon Consultants, Inc.

Lawrence R. Keefe

Principal | Office Manager

N\PROJECTS\2010\23107012\Response to Principa 04-15-13.docx

Paul Millet, P.E.

Environmental Engineer

c. Matt Craddock - New Mission, LLC

Joseph G. Middleton / Alison Thayer - Temkin Wielga & Hardt LLP

Connie H. King - Law Firm of Connie H. King, LLC

June 17, 2013



Mr. Carl Spreng
Colorado Department of Public Health and Environment
HMWMD-HW-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3358

Email: carl.spreng@state.co.us

Re: King's One Hour Cleaners

3217 South Academy Boulevard Colorado Springs, Colorado Terracon Project No. 23107012

Dear Mr. Spreng;

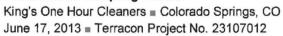
On behalf of New Mission, LLC, Terracon Consultants, Inc. (Terracon) is providing the results of groundwater sampling performed in general accordance with your letter dated November 26, 2012. The general location of the King's One Hour Cleaners site is shown on the attached Figure 1

On May 10, 2013, Terracon collected groundwater samples from on-site wells MW-4 and MW-8, "near off-site" wells MW-10 and MW-11, and downgradient (off-site) wells TM-10, TM-16, WSP-6 and WSP-7D. The approximate locations of these wells are shown on Figure 2. These wells were selected by Colorado Department of Public Health and Environment (CDPHE) for sampling because tetrachloroethylene (PCE) was detected at concentrations above the USEPA Maximum Contaminant Level (MCL) of 5 micrograms per liter (μ g/l) in groundwater samples previously collected from these wells. Per CDPHE guidance, groundwater samples were collected from each well at approximately mid-depth in the observed water column using Hydra Sleeve samplers.

Recent and historic sample results for PCE for selected wells, including the Security Water District well S-14, are summarized in the table below. The laboratory's report for the groundwater sampling performed in May 2013 is attached.



Groundwater Sampling Results





Summary of PCE Results (ug/L)

Sample Date	MW4	MW-8	MW-10	MW-11	TIM-10	TM-16	WSP-6	WSP-7D	8-14 41-8
03/16/09					1.9*	3.6*	4.5*		5.5**
6/15/09*					1.9*	3.0*	4.6*		2.7**
11/5/09*	1.9							1.6*	5.6**
04/27/10	2.5								7.1**
10/13/11		3.2							10**
12/27-29/11	2.2	4.7	4.7						5.2**
06/13/12		**	7.2	14					6.9**
12/28/12			5.7	7.6	1.7	4.1	8.9	6.4	6.2**
01/23/13									5.6*
02/19/13									4.3*
03/19/13									4.8*
04/16/13									4.9*
05/10/13	2.5	2.4	2.2	11	8.3	2.9	8.9	6.4	

^{*} Sample results reported by CDPHE

The concentrations of PCE in on-site wells MW-4 and MW-8 have been below the MCL since monitoring began in 2009. The concentration of PCE in off-site well MW-10 was also below the MCL in the May 2013 sample and appears to be declining at well MW-11 when compared to the June 2012 sample result. The PCE concentration at well S-14 has also been below the MCL since the February 2013 sampling event.

Findings, conclusions and recommendations resulting from these services are based upon information derived from on-site activities and other services performed as described herein; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents may have been latent, inaccessible, unobservable, nondetectable or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic substances, petroleum products, or other latent conditions beyond those identified during this investigation. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations or exploratory services; the data, interpretations, findings and our recommendations are based solely upon data obtained at the time and within the scope of these services.

^{**} Same month sample results reported by CDPHE

⁻⁻ Not sampled

Groundwater Sampling Results

King's One Hour Cleaners ■ Colorado Springs, CO June 17, 2013 ■ Terracon Project No. 23107012



Please do not hesitate to contact us should you have any questions or require additional information.

Respectfully submitted,

Terracon Consultants, Inc.

Paul R. Millet, P.E., CHMM

Project Environmental Engineer

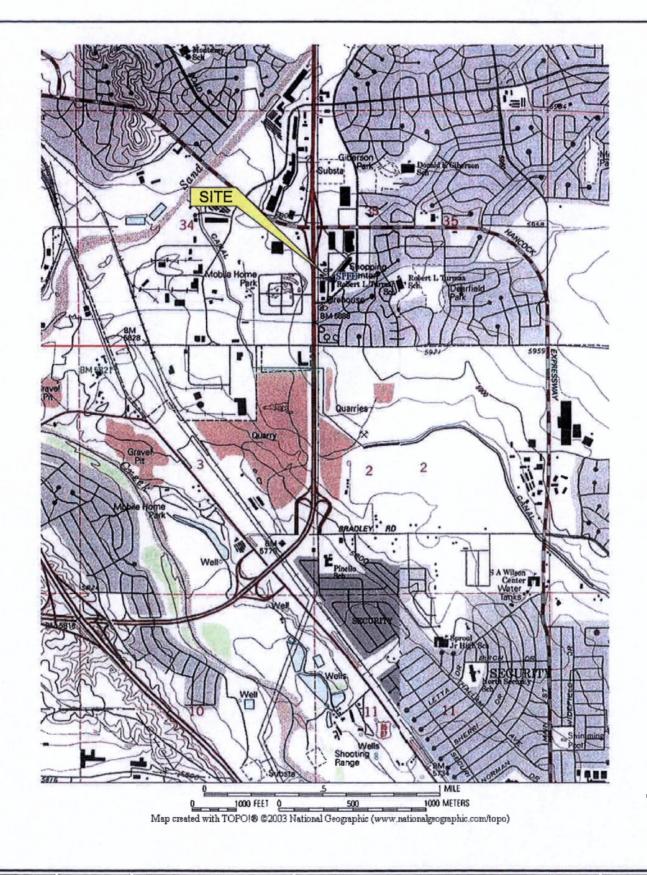
N:PROJECTS\2010\23107012\Dec 2012 Sampling & Reporting\Spreng _022213.docx

Lawrence R. Keefe

Principal | Office Manager

Attachments

c. Matt Craddock – New Mission, LLC
Connie H. King – Law Firm of Connie H. King, LLC
Alison J. Thayer - Temkin Wielga & Hardt LLP



23107012 DJS AS NOTED 08/20/2010 LK

leffacon
Consulting Engineers and Scientists

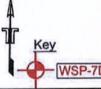
4172 Center Park Dr.	Colorado Springs, CO 80916
PH. (719) 597-2116	FAX: (719) 597-2117

FIGURE 1:	SITE	LOCATI	ON MAP
LUNIOO	חחו	/ OL EA	MED

KINGS DRY CLEANER	
KINGS DRY CLEANER 3217 S. ACADEMY BLVD. COLORADO SPRINGS, COLORADO N:Projects - Other Offices/Colorado Springs - No.23/23107012/23107012-1(SVM).dwg	
COLORADO SPRINGS, COLORADO	
N:\Projects - Other Offices\Colorado Springs - No.23\23107012\23107012-1(SVM).dwg	

FIG. No.





Monitoring Well

tap created with El Paso County Assessor Map (http://gis2.asr.elpasoco.com/?Sched=8435320020)

Project Mngr:	LK	Project No. 23107012
Drawn By:	JB	Scale: AS NOTED
Checked By:	LK	Dele: 01/14/13
Approved By:	LK	

lleccacon
Constitute Contracts and Coloration
Consulting Engineers and Scientists

4172 Center Park Dr.	Colorado Springs, CO 80916
PH. (719) 597-2118	FAX. (719) 597-2117

FIGURE 2: MONITORING WELL LOCATION DIAGRAM

KINGS DRY CLEANER

3217 S. ACADEMY BLVD. COLORADO SPRINGS, COLORADO

F	G.	No.

2



12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Report Summary

Friday May 17, 2013

Report Number: L635308 Samples Received: 05/11/13 Client Project: 23107012

Description: Kings

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

Daphne Richards , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197, FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704/BIO041, ND - R-140. NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612, MN - 047-999-395, NY - 11742, WI = 998093910, NV - TN000032011-1, TX - T104704245-11-3, OK - 9915, PA - 68-02979, IA Lab #364

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences. Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

This report may not be reproduced, except in full, without written approval from ESC Lab Sciences. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



11, 2013

12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L635308-01

Date Received Description

May Kings

Site ID :

Sample ID

TM-10

Project # :

Collected By : Collection Date :

Paul Millet 05/10/13 09:55

23107012

Parameter	Result	Det. Limit	Units.	Method	Date Dil.
Volatile Organics					_
Acetone	BDL	0.050	mg/l	8260B	05/12/13
Acrolein	BDL	0.050	mq/1	8260B	05/12/13 1
Acrylonitrile	BDL	0.010	mg/l	8260B	05/12/13 1
Benzene	BDL	0.0010	mq/l	8260B	05/12/13 1 05/12/13 1
Bromobenzene	BDL	0.0010	mg/l	8260B	05/12/13
Bromodichloromethane	BDL	0.0010	mq/l	8260B	05/12/13
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromomethane	BDL	0.0050	mg/l	8260B	05/12/13
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Chloroethane	BDL	0.0050	mg/l	8260B	05/12/13 1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	05/12/13 1
Chloroform	BDL	0.0050	mq/l	8260B	05/12/13 1
Chloromethane	BDL	0.0025	mg/l	8260B	05/12/13 1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dibromo-3-Chloropropane	\mathtt{BDL}	0.0050	mg/l	8260B	05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	05/12/13
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloropropene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	05/12/13 1 05/12/13 1 05/12/13 1 05/12/13 1
Ethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13
Hexachloro-1,3-butadiene	BDL.	0.0010	mg/l	8260B	05/12/13
Isopropylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1 05/12/13 1 05/12/13 1
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	05/12/13



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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Site ID :

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received : May Description : Kings

11, 2013

Sample ID

TM-10

Project # : 23107012

ESC Sample # : L635308-01

Collected By Paul Millet Collection Date 05/10/13 09:55

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	05/12/13	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	05/12/13	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	05/12/13	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13	1
Naphthalene	BDL	0.0050	mg/l	8260B	05/12/13	1
n-Propylbenzene	BDL	0.0010	mq/1	8260B	05/12/13	1
Styrene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1:
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	05/12/13	1.
Tetrachloroethene	0.0083	0.0010	mg/l	8260B	05/12/13	1
Toluene	BDL	0:0050	mq/l	8260B	05/12/13	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Trichloroethene	BDL.	0.0010	mg/l	8260B	05/12/13	1
Trichlorofluoromethane	BD L	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Vinyl chloride	BDL	0:0010	mg/l	8260B	05/12/13	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	05/12/13	1
Surrogate Recovery						
Toluene-d8	102.		% Rec.	8260B	05/12/13	1
Dibromofluoromethane	96.6		% Rec.	8260B	05/12/13	1
4-Bromofluorobenzene	102.		% Rec.	8260B	05/12/13	1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)

Note:

The reported analytical results relate only to the sample submitted.

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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

: May

ESC Sample # : L635308-02

Date Received Description

Kings

Site ID :

Sample ID

TM-16

Project # : 23107012

Collected By : Collection Date :

Paul Millet 05/10/13 10:10

11, 2013

Parameter	Result	Det. Limit	Units	Method	Date Dil.
Volatile Organics					7-17
Acetone	BDL	0. 050	mg/l	8260B	05/12/13 1
Acrolein	BDL	0 .050	mg/l	8260B	05/12/13 1
Acrylonitrile	BDL	0.010	mg/1	8260B	05/12/13 1
Benzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromomethane	BDL	i 0 ∴0050	mg/l	8260B	05/12/13 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
sec-Butylbenzene	BDL	0 .0010	mg/l	8260B	05/12/13 1
tert-Butylbenzene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Chloroethane	BDL	0 .0050	mg/l	8260B	05/12/13 1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	05/12/13 1
Chloroform	BDL	0. 0050	mg/l	8260B	05/12/13 1
Chloromethane	BDL	0.0025	mg/l	8260B	05/12/13 1
2-Chlorotoluene	BDL,	0 .0010	mq/l	8260B	05/12/13, 1
4-Chlorotoluene	BDL	0.:0010	mg/l	8260B	05/12/13 1
1,2-Dibromo-3-Chloropropane	BDL	0. 0050	mg/l	8260B	05/12/13 1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Dibromomethane	BDL	0 .0010	mg/l	8260B	05/12/13 1
1,2-Dichlorobenzene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Dichlorodifluoromethane	BDL.	0. 0050	mg/l	8260B	05/12/13 1
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
trans-1,2-Dichloroethene	BDL,	0.0010	mq/l	8260B	05/12/13 1
1,2-Dichloropropane	BDL	0.0010	mq/l	82,60B	05/12/13 1
1,1-Dichloropropene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
cis-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B	05/12/13 1
trans-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B	05/12/13 1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	05/12/13 1
Ethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Hexachloro-1,3-butadiene	BDL	0.0010	mq/1	8260B	05/12/13 1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
p-Isopropyltoluene	BDL	0.0010	mq/l	8260B	05/12/13 1



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REPORT OF ANALYSIS

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

May 17, 2013

ESC Sample # : L635308-02

Date Received

Description

Kings

Site ID :

Sample ID

TM-16

Collected By E Collection Date :

Paul Millet 05/10/13 10:10

11, 2013

Project #: 23107012

Parameter	Result	Det. Limit	Units		DateDil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	05/12/13 1
Methylene Chloride	BDL	0.0050	mg/l	8260B	05/12/13 1
4-Methyl-2-pentanone (MIBK)	BDL.	0.010	mg/l	8260B	05/12/13 1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13 1
Naphthalene	BDL	0.0050	mq/l	8260B	05/12/13 1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Styrene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/1	8260B	05/12/13 1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	82.60B	05/16/13 1
Tetrachloroethene	0.0029	0.0010	mg/l	8260B	05/12/13 1
Toluene	BDL	0.0050	mg/l	8260B	05/12/13 1
1,2,3-Trichlorobenzene	BDL	0.0010	mq/l	8260B	05/12/13 1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1,2-Trichloroethane	BDL	0.0010	mg/1	8260B	05/12/13 1
Trichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	05/12/13 1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13 1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2,3-Trimethylbenzene	BOL	0.0010	mg/l	8260B	05/12/13 1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Vinyl chloride	BDL	0.0010	mg/l	8260B	05/12/13 1
Xylenes, Total	BDL	0.0030	mg/l	8260B	05/12/13 1
Surrogate Recovery			-		
Toluene-d8	100.		% Rec.	8260B	05/12/13 1
Dibromofluoromethane	97.1		% Rec.	8260B	05/12/13 1
4-Bromofluorobenzene	103.		% Rec.	8260B	05/12/13 1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

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REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

11, 2013

Date Received : Description : Kings

WSP-6 Sample ID

Collected By Collection Date Paul Millet 05/10/13 10:20

L635308-03 ESC Sample # :

Site ID :

Project # : 23107012

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Volatile Organics						
Acetone	BDL	0.050	mg/l	8260B	05/12/13	1
Acrolein	BDL	0.050	mg/l	8260B	05/12/13	1
Acrylonitrile	BDL	0.010	mg/l	8260B	05/12/13	1
Benzene	BDL	0.0010	mg/1	8260B	05/12/13	1
Bromobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Bromoform	BDL	0.0010	mq/l	8260B	05/12/13	1
Bromomethane	\mathtt{BDL}	0.0050	mg/l	8260B	05/12/13	1
n-Butvlbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Chlorodibromomethane	BDL	0.0010	mq/l	8260B	05/12/13	1
Chloroethane	BDL	0.0050	mq/l	8260B	05/12/13	1
2-Chloroethyl vinyl ether	BDL	0.050	mg/1	8260B	05/12/13	ī
Chloroform	BDL	0.0050	mg/l	8260B	05/12/13	ī
Chloromethane	BDL	0.0025	mg/l	8260B	05/12/13	1
2-Chlorotoluene	BDL	0.0010	mq/l	8260B	05/12/13	ĩ
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	05/12/13	ī
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,3-Dichlorobenzene	BDL	0.0010	mq/1	8260B	05/12/13	ī
1,4-Dichlorobenzene	BDL	0.0010	mq/l	8260B	05/12/13	ī
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	ī
1,1-Dichloroethane	BDL	0.0010	mg/1	8260B	05/12/13	ī
1,2-Dichloroethane	BDL	0.0010	mg/1	8260B	05/12/13	ī
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	ī
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	ī
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,2-Dichloropropane	BDL	0.0010	mg/l	82,60B	05/12/13	ī
1,1-Dichloropropene	BDL	0.0010	mg/1	8260B	05/12/13	ī
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13	ī
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13	ī
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13	ī
2,2-Dichloropropane	BDL	0.0010	mg/1	8260B	05/12/13	i
Di-isopropyl ether	BDL	0.0010	mq/l	8260B	05/12/13	i
Ethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	î
Hexachloro-1,3-butadiene	BDL	0.0010	mg/1	8260B	05/12/13	1
Isopropylbenzene	BDL	0.0010	mg/1	8260B	05/12/13	i
p-Isopropyltoluene	BDL	0.0010	mg/1	8260B	05/12/13	ī
b. reobtobliconneue	БОП	0.0010	mg/ I	3200B	05, 12, 15	-



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REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L635308-03

Date Received Description

May 11, 2013

Kings

Site ID :

Sample ID

WSP-6

Collected By Collection Date

Paul Millet 05/10/13 10:20

23107012 Project # :

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mq/l	8260B	05/12/13	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	05/12/13	1 1
4-Methyl-2-pentanone (MIBK)	\mathtt{BDL}	0.010	mg/l	8260B	05/12/13	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13	1
Naphthalene	BDL	0.0050	mg/l	8260B	.05/12/13	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Styrene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1,2-Tetrachloroethane	BDL	0:.0010	mg/l	8260B	05/12/13	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	05/16/13	1
Tetrachloroethene	0.0089	0.0010	mg/l	8260B	05/12/13	1
Toluene	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 [.]	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1-Trichloroethane .	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Trichloroethene	BDL	0.0010	mg/1	8260B	05/12/13	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	82,60B	05/12/13	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	82,60B	05/12/13	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Vinyl chloride	BDL	0.,0010	mg/l	82,60B	05/12/13	1
Xylenes, Total	\mathtt{BDL}	0.0030	mg/l	8260B	05/12/13	1
Surrogate Recovery						
Toluene-d8	101.		% Rec.	8260B	05/12/13	1
Dibromofluoromethane	96.7		% Re c. ∴	8260B	05/12/13	1
4-Bromofluorobenzene	101.		% Rec.	8260B	05/12/13	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

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REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received : Description :

11, 2013 May

Kings

Sample ID

WSP-7D

Collected By Collection Date

Paul Millet 05/10/13 10:35

Site ID :

Project #: 23107012

ESC Sample # : 1635308-04

Parameter	Result	Det. Limit	Units	Method	Date Dil:
Volatile Organics					
Acetone	BDL	0,050	mg/l	8260B	05/12/13 1
Acrolein	BDL	0.050	mg/l	8260B	05/12/13 1
Acrylonitrile	BDL	0.010	mg/l	8260B	05/12/13 1
Benzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromobenzene	BDL	0,0010	mg/l	8260B	05/12/13 1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromomethane	BDL	0.0050	mg/1	8260B	05/12/13 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Chloroethane	BDL	0.0050	mg/l	8260B	05/12/13 1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	05/12/13 1
Chloroform	BDL	0.0050	mq/l	8260B	05/12/13 1
Chloromethane	BDL	0.0025	mg/l	8260B	05/12/13 1
2-Chlorotoluene	BDL.	0.0010	mg/l	8260B	05/12/13 1
4-Chlorotoluene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,2-Dibromo-3-Chloropropane	BDL	0,0050	mg/1	8260B	05/12/13 1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichlorobenzene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	05/12/13 1
1,1-Dichloroethane	BDI.	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloroethene	BDL.	0.0010	mq/l	8260B	05/12/13 1
cis-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	05/12/13 1
trans-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloropropene	BDL	0.0010	mq/l	8260B	05/12/13 1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
cis-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B	05/12/13 1
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13 1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	05/12/13 1
Ethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	05/12/13 1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
p-Isopropyltoluene	BDL	0:.:0010	mg/l	8260B	05/12/13



Tax I.D. 62-0814289

L635308-04

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

ESC Sample # :

Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received

May

11, 2013

Description

Paul Millet

Site ID :

Sample ID

WSP-7D

Project # : 23107012

Collected By : Collection Date :

Paul Millet 05/10/13 10:35

rameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mq/l	8260B	05/12/13	1
Methylene Chloride	BDL	0.0050	mg/1	8260B	05/12/13	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	05/12/13	1
Methyl tert-butyl ether	BDL	0.0010	mq/l	8260B	05/12/13	1
Naphthalene	BDL	0.0050	mg/l	8260B	05/12/13	1
n-Propylbenzene	BDL	0.0010	mg/1	8260B	05/12/13	1
Styrene	BDL	0.0010	mg/l	8260B	05/12/13	1
1, 1, 1, 2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichlorotrifluoroethane	0.0010	0.0010	mg/l	8260B	05/12/13	1
Tetrachloroethene	0.0064	0.0010	mg/l	8260B	05/12/13	1
Toluene	BDL	0.0050	mq/l	8260B	05/12/13	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichloroethane	BDL	0.0010	mq/l	8260B	05/12/13	1
Trichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	ī
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13	1
1,2,4-Trimethylbenzene	BDL	0.0010	mq/l	8260B	05/12/13	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	ī
Vinyl chloride	BDL	0.0010	mg/l	8260B	05/12/13	ī
Xylenes, Total	BDL	0.0030	mq/l	8260B	05/12/13	1
irrogate Recovery	222	0.0000	9, 2	02002	00,12,11	_
Toluene-d8	100.		% Rec.	8260B	05/12/13	1
Dibromofluoromethane	95.6		% Rec:	8260B	05/12/13	ī
4-Bromofluorobenzene	102.		% Rec	8260B	05/12/13	ī

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

The reported analytical results relate only to the sample submitted. This report shall not be reproduced, except in full, without the written approval from ESC.

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YOUR LAB OF CHIOLOE

12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

11, 2013

ESC Sample # : L635308-05

Date Received : Description :

Collected By Collection Date

Kings

Sample ID

MW-11

Paul Millet 05/10/13 11:25

Site ID :

Project #: 23107012

Parameter	Result	DetLimit	Units	Method	Date Dil.
Volatile Organics					
Acetone	BDL	0.050	mq/l	8260B	05/12/13 1
Acrolein	BDL	0.050	mg/l	8260B	05/12/13 1
Acrylonitrile	BDL	0.010	mq/l	8260B	05/12/13 1
Benzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromomethane	BDL	0.0050	mg/l	8260B	05/12/13 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
sec-Butylbenzene	BDL	0.0010	mq/l	8260B	05/12/13 1
tert-Butylbenzene	BDL	0.0010	mq/l	8260B	05/12/13 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorobenzene	BDL	0.0010	mq/1	8260B	05/12/13 1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Chloroethane	BDL	0.0050	mg/l	8260B	05/12/13 1
2-Chloroethyl vinyl ether	BDL	0.050	mq/l	8260B	05/12/13 1
Chloroform	BDL	0.0050	mg/1	8260B	05/12/13 1
Chloromethane	BDL	0.0025	mg/1	8260B	05/12/13 1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/1	8260B	05/12/13 1
1,2-Dibromoethane	BDL	0.0010	mg/1	8260B	05/12/13 1
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,4-Dichlorobenzene	BDL	0.0010	mg/1	8260B	05/12/13 1
Dichlorodifluoromethane	BDL	0.0010	mg/1	8260B	05/12/13 1
1,1-Dichloroethane	BDL	0.0010	mg/1	8260B	05/12/13 1
1,2-Dichloroethane	BDL	0.0010	mg/1	8260B	
	BDL	0.0010	mg/1	8260B	05/12/13 1
1,1-Dichloroethene	BDL	0.0010	mg/1	8260B	05/12/13 1 05/12/13 1 05/12/13 1
cis-1,2-Dichloroethene	BDL	0.0010	mg/1	8260B	05/12/13 1
trans-1,2-Dichloroethene	BDL	0.0010		82.60B	05/12/13 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloropropene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,3-Dichloropropane		0.0010	mg/1	8260B	05/12/13 1
cis-1,3-Dichloropropene	BDL		mg/1	8260B	
trans-1,3-Dichloropropene	BDL	0.0010	mg/1	8260B 8260B	
2,2-Dichloropropane	BDL	0.0010	mg/l		
Di-isopropyl ether	BDL	0.0010	mg/1	8260B	05/12/13 1
Ethylbenzene	BDL	0.0010	mg/1	8260B	05/12/13 1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/1	8260B	05/12/13. 1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
p-Isopropyltoluene	BDL	0.0010	mg/l	82.60B	05/12/13 1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



MOURILAB OF CHOICE

12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # :

L635308-05

Date Received : Description :

May Kings

11, 2013

Site ID :

Sample ID

MW-11

Project # : 23107012

Collected By : Collection Date :

Paul Millet 05/10/13 11:25

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	05/12/13	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	05/12/13	1
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	05/12/13	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13	1
Naphthalene	BDL	0.0050	mq/l	8260B	05/12/13	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Styrene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Tetrachloroethene	0.011	0.0010	mg/l	8260B	05/12/13	1
Toluene	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/1	8260B	05/12/13	1
1,2,4-Trichlorobenzene	BDL	0.0010	mq/l	8260B	05/12/13	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1.1.2-Trichloroethane	BDL.	0.0010	mg/l	8260B	05/12/13	1
Trichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	05/12/13	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	05/12/13	1
urrogate Recovery			="			
Toluene-d8	101.		% Rec.	8260B	05/12/13	1
Dibromofluoromethane	97.2		% Rec.	8260B	05/12/13	1
4-Bromofluorobenzene	99.9		% Rec.	8260B	05/12/13	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

The reported analytical results relate only to the sample submitted.

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Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # : L635308-06

Date Received : Description :

May Kings 11, 2013

Site ID :

Project #: 23107012

Sample ID

MW-10

Collected By : Paul Millet Collection Date : 05/10/13 11:40

.Parameter	Result	Det. Limit	Units	Method	Date _Dil:
Volatile Organics					
Acetone	\mathtt{BDL}	0.050	mg/l	8260B	05/12/13 1
Acrolein	BDL	0.050	mg/l	8260B	05/12/13 1
Acrylonitrile	BDL	0.010	mg/l	8260B	05/12/13 1
Benzene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13 1
Bromobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromomethane	BDL	0.0050	mg/l	8260B	05/12/13 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
tert-Butylbenzene	BDL	0.0010	mq/1	8260B	05/12/13 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorodibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Chloroethane	BDL	0.0050	mg/l	8260B	05/12/13 1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	05/12/13 1
Chloroform	BDL	0.0050	mg/l	8260B	05/12/13 1
Chloromethane	BDL	0.0025	mg/l	8260B	05/12/13 1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
4-Chlorotoluene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mq/l	8260B	05/12/13 1
1,2-Dibromoethane	BDL	0.0010	mq/1	8260B	05/12/13 1
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichlorobenzene	BDL	0.0010	mg/1	8260B	05/12/13 1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Dichlorodifluoromethane	BDL	0.0050	mg/1	8260B	05/12/13 1
1,1-Dichloroethane	BDL	0.0010	mq/l	8260B	05/12/13 1
1.2-Dichloroethane	BDL	0.0010	mg/1	8260B	05/12/13 1
1.1-Dichloroethene	BDL.	0.0010	mg/l	8260B	05/12/13 1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
trans-1,2-Dichloroethene	BDL	0.0010	mq/l	8260B	05/12/13 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichloropropane	BDL	0.0010	mq/1	8260B	05/12/13 1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13 1
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13 1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	05/12/13 1
Ethylbenzene	BDL	0.0010	mg/1	8260B	05/12/13 1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/1	8260B	05/12/13 1
Isopropylbenzene	BDL	0.0010	mg/1	8260B	05/12/13: 1
p-Isopropyltoluene	BDL	0.0010	mg/1	8260B	05/12/13 1
b_raobrobArcorneue	PDL	0.0010	g/ 1	02000	. 00,12,10 1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



Tax I.D. 62-0814289

Est. 1970

MOUNT LAB OF CHOICE

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

Date Received de Description

May

11, 2013

Kings

Site ID :

Sample ID

MW-10

Project #: 23107012

ESC Sample # : L635308-06

Collected By : Collection Date

Paul Millet 05/10/13 11:40

arameter	Result	Det. Limit	Units	Method	Date	Dil.	
2-Butanone (MEK)	BDL	0010	mg/l	8260B	05/12/13	1	
Methylene Chloride	BDL	0.0050	mg/l 8260B	8260B	05/12/13	1	
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	05/12/13	1	
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13	1	
Naphthalene	BDL	0.0050	mg/l	8260B	05/12/13	1	
n-Propylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1	
Styrene	BDL	0.0010	mg/l	82.60B	05/12/13	1	
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1	
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1	
1, 1, 2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	05/12/13	1	
Tetrachloroethene	0.0022	0.0010	mg/l	8260B	05/12/13	1	
Toluene	BDL	0.0050	mg/l	8260B	05/12/13	1	
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1	
1,2,4-Trichlorobenzene	\mathtt{BDL}	0.0010	mg/l	82.60B	05/12/13	1	
1,1,1-Trichloroethane	BDL	0.0010	mg/1	82,60B	05/12/13	1	
1.1.2-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1	
Trichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	1	
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	1	
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13	1	
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1.	
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1	
1,3,5-Trimethylbenzene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13	1	
Vinyl chloride	BDL	0.0010	mg/l	8260B	05/12/13	1	
Xylenes, Total	BDL	0.0030	mg/l	8260B	05/12/13	1	
rrogate Recovery					,		
Toluene-d8	100.		% Rec.	8260B	05/12/13	1	
Dibromofluoromethane	97.8		% Rec.	8260B	05/12/13	1	
4-Bromofluorobenzene	101.		<pre>% Rec.</pre>	8260B	05/12/13	1	

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

The reported analytical results relate only to the sample submitted.

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Tax I.D. 62-0814289

Est. 1970

YIORUR BLAIB OF CHIORICE

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

11, 2013

Date Received : May

Sample ID

Collected By : Collection Date :

Kings

Paul Millet 05/10/13 10:50

ESC Sample # : L635308-07

Site ID :

Project # : 23107012

Parameter	Result	Det. Limit	Units	Method	Date Dil.
Volatile Organics					
Acetone	BDL	0.050	mg/l	8260B	05/12/13 1
Acrolein	BDL	0.050	mg/l	8260B	05/12/13 1
Acrylonitrile	BDL	0.010	mg/l	8260B	05/12/13 1
Benzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13 1
Bromomethane	\mathtt{BDL}	0.0050	mg/l	8260B	05/12/13 1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Carbon tetrachloride	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Chlorodibromomethane	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13 1
Chloroethane	BDL	0.0050	mg/l	8260B	05/12/13 1
2-Chloroethyl vinyl ether	BDL	0.050	mg/l	8260B	05/12/13 1
Chloroform	\mathtt{BDL}	0.0050	mg/l	8260B	05/12/13 1 05/12/13 1
Chloromethane	\mathtt{BDL}	0.0025	mg/l	8260B	05/12/13 1
2-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/l	8260B	05/12/13 1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	05/12/13 1
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
1.4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	05/12/13 1
1,1-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
cis-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13 1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
1,1-Dichloropropene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13 1
1,3-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13 1
trans-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13 1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13 1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	05/12/13 1
Ethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/1	8260B	05/12/13 1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	05/12/13 1
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	05/12/13 1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



Tax I.D. 62-0814289

Est. 1970

YOUR LAB OF CHOICE

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # :

L635308-07

Date Received : Description :

May

11, 2013

Kings

Site ID :

Sample ID

MW-4

Collected By : Collection Date :

Paul Millet 05/10/13 10:50

Project # : 23107012

Parameter	Result	Det. Limit	Units.	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	05/12/13	1
Methylene Chloride	BDL	0.0050	mg/l	8260B	05/12/13	î
4-Methyl-2-pentanone (MIBK)	BDL	0.010	mg/l	8260B	05/12/13	ī
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13	ī
Naphthalene	BDL	0.0050	mg/l	8260B	05/12/13	í
n-Propylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	ī
Styrene	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	82:60B	05/12/13	<u>1</u>
1,1,2,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Tetrachloroethene	0.0025	0.0010	mg/l	8260B	05/12/13	ī
Toluene	BDL	0.0050	mq/l	8260B	05/12/13	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,4-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	ī
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	ī
Trichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	1
Trichlorofluoromethane	BDL	0.0050	mg/1	8260B	05/12/13	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Vinyl chloride	BDL	0.0010	mg/l	8260B	05/12/13	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	05/12/13	1
Surrogate Recovery			•			
Toluene-d8	102.		ቼ Re c ୍	8260B	05/12/13	1
Dibromofluoromethane	94.6		% Rec.	8260B	05/12/13	1
4-Bromofluorobenzene	102.	•	% Rec.	8260B	05/12/13	1
*	-					

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:

The reported analytical results relate only to the sample submitted.

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Reported: 05/17/13 08:16 Printed: 05/17/13 08:17



Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916 May 17, 2013

ESC Sample # : L635308-08

Date Received : Description :

May

Site ID :

Kings

Sample ID

MW-8

Project # : 23107012

Collected By : Paul Millet Collection Date : 05/10/13 11:05

11, 2013

Parameter	Result	Det. Limit	Units_	Method	Date	Dil.
Volatile Organics						
Acetone	BDL	0,.050	mg/l	8260B	05/12/13	1
Acrolein	BDL	0.050	mq/l	8260B	05/12/13	1 1
Acrylonitrile	BDL	0.010	mg/l	8260B	05/12/13	1
Benzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Bromobenzene	BDL	00010	mg/1	8260B	05/12/13	1
Bromodichloromethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Bromoform	BDL	0.0010	mg/l	8260B	05/12/13	1
Bromomethane	BDL	0.0050	mg/l	8260B	05/12/13	1
n-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
sec-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
tert-Butylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Carbon tetrachloride	BDL	0:.:0010	mg/l	8260B	05/12/13	1
Chlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Chlorodibromomethane	BDL	0.0010	mq/l	8260B	05/12/13	1
Chloroethane	BDL	0.0050	mq/l	8260B	05/12/13	1
2-Chloroethyl vinyl ether	BDL	0.050	mq/l	8260B	05/12/13	1
Chloroform	BDL	0.0050	mq/l	8260B	05/12/13	1
Chloromethane	BDL	0.0025	mg/l	8260B	05/12/13	1
2-Chlorotoluene	BDL	0.0010	mq/l	8260B	05/12/13	1
4-Chlorotoluene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2-Dibromo-3-Chloropropane	BDL	0.0050	mg/1	8260B	05/12/13	1
1,2-Dibromoethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Dibromomethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1.2-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,3-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,4-Dichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Dichlorodifluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	1
1,1-Dichloroethane	BDL	0.0010	mg/1	8260B	05/12/13	1
1,2-Dichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1.1-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	1
cis-1,2-Dichloroethene	BDL	0:0010	mg/l	B260B	05/12/13	1
trans-1,2-Dichloroethene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,3-Dichloropropane	BDL	0.0010	mg/1	8260B	05/12/13	1
cis-1,3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13	1
trans-1.3-Dichloropropene	BDL	0.0010	mg/l	8260B	05/12/13	1
2,2-Dichloropropane	BDL	0.0010	mg/l	8260B	05/12/13	1
Di-isopropyl ether	BDL	0.0010	mg/l	8260B	05/12/13	1
Ethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Hexachloro-1,3-butadiene	BDL	0.0010	mg/l	8260B	05/12/13	1
Isopropylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
p-Isopropyltoluene	BDL	0.0010	mg/l	8260B	05/12/13	1

BDL - Below Detection Limit Det. Limit - Practical Quantitation Limit(PQL)



YOUR LAB JOE CHOLCE

12065 Lebanon Rd. Mt. Juliet, TN 37122 (615) 758-5858 1-800-767-5859 Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

May 17, 2013

Paul Millet Terracon - Colorado Springs 4172 Center Park Drive Colorado Springs, CO 80916

ESC Sample # :

L635308-08

Date Received Description

May

11, 2013

Kings

Site ID :

Sample ID

MW-8

Collected By : Collection Date :

Paul Millet 05/10/13 11:05

Project # : 23107012

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
2-Butanone (MEK)	BDL	0.010	mg/l	8260B	05/12/13	1.
Methylene Chloride	BDL.	0.0050	mg/l	8260B	05/12/13	1
4-Methyl-2-pentanone (MIBK)	\mathtt{BDL}	0.010	mg/l	8260B	05/12/13	1
Methyl tert-butyl ether	BDL	0.0010	mg/l	8260B	05/12/13	1
Naphthalene	BDL	0.0050	mg/l	8260B	05/12/13	1
n-Propylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1 1
Styrene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,1,2-Tetrachloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
1,1,2,2-Tetrachloroethane	BDL	Ô.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichlorotrifluoroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Tetrachloroethene	0.0024	0.0010	mg/l	8260B	05/12/13	1
Toluene	BDL.	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichlorobenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
1,2,4-Trichlorobenzene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13	1
1,1,1-Trichloroethane	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13	1
1,1,2-Trichloroethane	BDL	0.0010	mg/l	8260B	05/12/13	1
Trichloroethene	\mathtt{BDL}	0.0010	mg/l	8260B	05/12/13	1
Trichlorofluoromethane	BDL	0.0050	mg/l	8260B	05/12/13	1
1,2,3-Trichloropropane	BDL	0.0025	mg/l	8260B	05/12/13	1
1,2,4-Trimethylbenzene	BDL	0.0010	mg/l	82.60B	05/12/13	1
1,2,3-Trimethylbenzene	BDL	0.0010	mg/1	8260B	05/12/13	1
1,3,5-Trimethylbenzene	BDL	0.0010	mg/l	8260B	05/12/13	1
Vinyl chloride	BDL	0.0010	mg/1	8260B	05/12/13	1
Xylenes, Total	BDL	0.0030	mg/l	8260B	05/12/13	1
Surrogate Recovery		•	<u>-</u>			
Toluene-d8	102.		% Rec.	8260B	05/12/13	1
Dibromofluoromethane	99.7		% Rec.	8260B	05/12/13	1
4-Bromofluorobenzene	100.		% Rec.	8260B	05/12/13	1

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit(PQL)

Note:
The reported analytical results relate only to the sample submitted.
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Reported: 05/17/13 08:16 Printed: 05/17/13 08:17

Attachment A List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
		-			
L635308-01	WG660873	SAMP	Acetone	R2671986	J4
	WG660873	SAMP	2-Chloroethyl vinyl ether	R2671986	J6J3
L635308-02	WG660873	SAMP	Acetone	R2671986	J4
L635308-03	WG660873	SAMP	Acetone	R2671986	J4
L635308-04	WG660873	SAMP	Acetone	R2671986	J4
L635308-05	WG660873	SAMP	Acetone	R2671986	J4
L635308-06	WG660873	SAMP	Acetone	R2671986	J4
L635308-07	WG660873	SAMP	Acetone	R2671986	J4
L635308-08	WG660873	SAMP	Acetone	R2671986	J4

Attachment B Explanation of OC Qualifier Codes

Qualifier	Meaning									
J3	The associated batch QC was outside the established quality control range for precision.									
J 4	The associated batch QC was outside the established quality control range for accuracy.									
J6	The sample matrix interfered with the ability to make any accurate determination; spike value is low									

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods, it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

Definitions

- Accuracy The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.
- Precision The agreement between a set of samples or between duplicate samples.

 Relates to how close together the results are and is represented by Relative Percent Difference.
- Surrogate Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.
- TIC Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

		В	silling informatio	n:			An	alysis/Contain	er/Preserva	ative	7
Terracon - Colorado	Springs							30	4		Page of
	- P8		Accounts F	Pavahla				ACT.		10-	
4172 Center Park Drive			4172 Cent		ive		2 4				
Colorado Springs,CO 80	016							415	4		MITCO
Colorado Springs, CO 80	910	ĺ	Colorado S	Springs, CC	80916		K.				
								WE	1.25	1775	LAB SCHENCES
Report to:			Emait					9	27.02	200	12065 Lebanon Road
Paul Millet				nillet@teri	racon.com			7.33 7.33	45	400	Mt. Juliet, TN 37122
Project Description: Kings			City/State Collected	Colo 6	PRAS, (90			2	新·	Phone: (800) 767-5859
	Client Project #:			roject #	1						Phone: (615) 758-5858 Fax: (615) 758-5859
Phone: (719) 597-2116				RCSCO-2	3107012			100 P	5 4		FAX. (013) 730-3039
FAX: (719) 597-2117 Collected by (print):	23107012 Site/Facility ID#:			NCSCO-2.	5107012		ō	70.00	442	\$	
Collected by (print): PALL MILLET	Site/Facility ID#:		P.O.#:				포		-05	4.8	
Collected by (signature): 11 12		Lab MUST B		Date Resu	ılts Neeced	1	빌			4. 进	Acctnum: TERRCSCO (lab use only)
1 d & Millet				5-76	DAYTAT	+	nIA	2.0	5		Template/Prelogin T86303/ P427698
mmediately Packed on Ice N Y					No X Yes	No.	401	+3			Cooler # 4 25-13 CA
acked on ice iv 1				FAX?		of	99	2277	3,		Shipped Via: FedEX Ground
Sample ID	Comp/Grab	Matrix*	Depth	Date	Time	Cntrs	V8260 40mlAmb-HCl		# ·		100 OC 100 S 70 S 100 S 10 S 10 S 10 S 10 S 10
			- Jopan	-		_	是是	200	5.04	F 201	Remarks/Contaminant Sample # (lab only)
TM-10	GRAB	GW		7/10/13		_	X	329	1	77	[635307-21
TM-16	CILAB	GW	1)	1010	2	X	-55	3254	at de	N.
WSP-6	GRA	GW		-	1020	_	X	25	24	F. 4	63
WSP-7D	GRAB	GW			1035	4	X	\$ 0	4	100	of
MW-11	GAMB	GW	-	\rightarrow	1123	2	X	1	40.78	13.7	4
MW-10	GRAB	GW			1140	2	X	200		36.5	υC
MW-4	CIRAM	GW	_	1.5	1050	2	X	2000	1750	扩射	9
MW-8	GRAM	GW	_	4	1105	2	X	5			70
							9/			35	
*Matrix: SS - Soil GW - Groundwater WW -	WasteWater DV	W - Drinking W	ater OT - Othe							nΗ	Temp
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 8**

1595 Wynkoop Street DENVER, CO 80202-1129 Phone 800-227-8917 http://www.epa.gov/region08

February 15, 2011

Ref: 8EPR-SA

MEMORANDUM

Municipal Well S-14 Determination for the Widefield PCE Site, SUBJECT:

Colorado Springs, Colorado.

David Romero FROM:

David Romero OSC, Superfund Response and Removal Uniting Inc.

TO: Curtis Kimbel

Chief, Superfund Response and

On January 11, 2011, I was asked to make a determination on the subject site based on the criteria for determining the appropriate extent of response authorized by Comprehensive Environmental Response Compensation Liability Act (CERCLA) and the Clean Water Act (CWA) section 300c. This guidance can be found in the National Contingency Plan (NCP) Subpart E Hazardous Substance Response. The initial request came from the Colorado Department of Public Health and Environment (CDPHE) after Municipal Well S-14 was contaminated by Tetracliprocthylene (PCE) and exceeds the Maximum Contaminant Level (MCL) drinking water standards of 5ppb. CDPHE is petitioning the Environmental Protection Agency (EPA) Emergency Response Removal Program for a water treatment system on contaminated Municipal Well S-14 to allow use of this drinking water supply

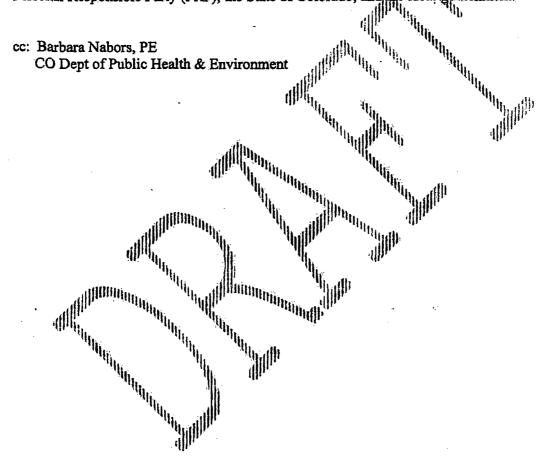
Based on the criteria, and the authority given as outlined in the NCP, I do not believe that the request made by ODPHE warrants intervention by conducting an Emergency Response Time-Critical Removal for the following reasons:

- 1. Although there has been a release to the environment of a hazardous substance, I do not believe this release presents an imminent and substantial danger to the public health. Municipal Well S₁₁14 is not currently in use as a drinking water source, therefore taking away the substantial endangerment to public health argument. EPA's emergency response role in this particular case would be to minimize or take away the threat by shutting down Well S-14, and, if needed, provide an alternate water source for the district.
- 2. Since the water district pulls 2,000 to 2,200 acre feet of ground water from the Widefield aquifer via approximately twenty-two different points of diversion, the need to remedy Well S-14 would be relatively insignificant since it only accounts for 5% or less of the total amount of drinking water needed to supply the needs of the surrounding community. The long-term future needs of the district may be better served by installing new wells outside the zone of influence of the PCE contamination.

EXHIBIT

3. Consideration might well be warranted if Well S-14 was the sole and primary source of water supply for the neighboring population; but that scenario does not exist for this particular situation, since there are other points from which the water district is able to source out and obtain water.

Based on the finding from review of the site file, this site should be recommended for scoring by the Hazardous Ranking System (HRS) and, if qualified, be listed as a site on the National Priorities List (NPL). There are issues within this site that will require the attention and funding of a long-term cleanup/remedy, something that may not be plausible given the limited resources provided by the Personal Responsible Party (PRP), the State of Colorado, and the local government.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

1595 Wynkoop Street DENVER, CO 80202-1129 Phone 800-227-89:17 http://www.epa.gov/region08

March 1, 2011

Ref: 8EPR-SA

MEMORANDUM

SUBJECT: Municipal Well S-14 Determination for the Widefield PCE Site,

Colorado Springs, Colorado.

FROM: David Romero

OSC, Superfund Response and Removal Unit

TO: Curtis Kimbel

Chief, Superfund Response and Removal Unit

On January 11, 2011, I was asked to make a determination on the subject site based on the criteria for determining the appropriate extent of response authorized by Comprehensive Environmental Response Compensation Liability Act (CERCLA) and the Clean Water Act (CWA) section 300c. This guidance can be found in the National Contingency Plan (NCP) Subpart E Hazardous Substance Response. The initial request came from the Colorado Department of Public Health and Environment (CDPHE) after Municipal Well S-14 was contaminated by Tetrachloroethylene (PCE) and exceeds the Maximum Contaminant Level (MCL) drinking water standards of 5ppb. CDPHE is petitioning the Environmental Protection Agency (EPA) Emergency Response Removal Program for a water treatment system on contaminated Municipal Well S-14 to allow use of this drinking water supply well.

Based on the criteria, and the authority given as outlined in the NCP, I do not believe that the request made by CDPHE warrants intervention by conducting an Emergency Response Time-Critical Removal for the following reasons:

- 1. Although there has been a release to the environment of a hazardous substance, I do not believe this release presents an imminent and substantial danger to the public health.

 Municipal Well S-14 is not currently in use as a drinking water source, therefore taking away the substantial endangerment to public health argument. EPA's emergency response role in this particular case would be to minimize or take away the threat by shutting down Well S-14, and, if needed, provide an alternate water source for the district.
- 2. Since the water district pulls 2,000 to 2,200 acre feet of ground water from the Widefield aquifer via approximately twenty-two different points of diversion, the need to remedy Well S-14 would be relatively insignificant since it only accounts for 5% or less of the total amount of drinking water needed to supply the needs of the surrounding community. The long-term future needs of the district may be better served by installing new wells outside the zone of influence of the PCE contamination.

EPA #COD981541436 M&E 1.3

[Type text]

3. Consideration might well be warranted if Well S-14 was the sole and primary source of water supply for the neighboring population; but that scenario does not exist for this particular situation, since there are other points from which the water district is able to source out and obtain water.

Based on the finding from review of the site file, this site should be recommended for scoring by the Hazardous Ranking System (HRS) and, if qualified, be listed as a site on the National Priorities List (NPL). There are issues within this site that will require the attention and funding of a long-term cleanup/remedy, something that may not be plausible given the limited resources provided by the Personal Responsible Party (PRP), the State of Colorado, and the local government.

cc: Barbara Nabors, PE
CO Dept of Public Health & Environment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8 1595 Wynkoop Street

1595 Wynkoop Street DENVER, CO 80202

Ref: 8EPR-ER

ACTION MEMORANDUM

DATE:

June 01, 2011

SUBJECT:

Request for a Time-Critical Removal Action at the Widefield PCE Site in Security, El

Paso County, Colorado

FROM:

Paul Peronard, On-Scene Coordinator MMChuk for

Emergency Response Unit

THROUGH: Curtis Kimbel, Supervisor

Emergency Response Unit

TO:

David Ostrander, Director

Preparedness, Assessment & Emergency Response Program

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of, and funding for, the Time-Critical Removal Action (Removal Action) described herein. This Removal Action addresses the contamination of a municipal water supply by chlorinated solvents at the Widefield PCE Site (the Site) in the Colorado Springs suburb of Security, Colorado. The chlorinated solvents were likely released to the Widefield Aquifer, the source of Security's water supply, from a dry cleaning business. Tetrachloroethylene (PCE) is the primary contaminant of concern.

The conditions existing at this Site present a threat to public health and meet the criteria for initiating a Removal Action under 40 CFR, Section 300.415(b)(2) of the National Contingency Plan (NCP). The proposed Removal Action will involve construction of a water treatment facility to remove the contaminant of concern before it enters the public water supply. Operation and maintenance of this facility will be the responsibility of the Security Water District (SWD).

It is anticipated that this Removal Action will take less than 12-months and cost less than \$2 million and thus will not require an exemption from the statutory limits of a Removal Action. Based on the nature of the Site and the anticipated work, there are no nationally significant or precedent-setting issues associated with this Removal Action. Furthermore, this Removal Action will not establish any regional precedent for future Site actions nor commit the United States Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future resources.

II. SITE CONDITIONS AND BACKGROUND

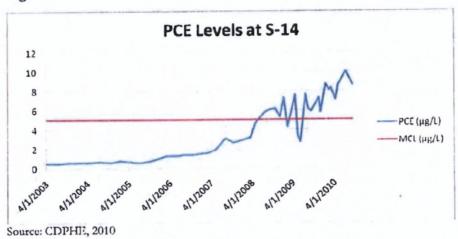
A. SITE DESCRIPTION

1. Removal Site Evaluation

The CERCLIS ID for this Site is 08SQ. Site conditions are such that this Removal Action is classified as time-critical.

Contamination at the Widefield PCE Site was first identified in 2003 when the Security Water District (SWD) detected tetrachloroethylene (also known as perchloroethylene, perc, or PCE) in one of its 22 municipal water supply wells. Periodic sampling results since 2003 indicate that PCE levels in this well, identified as S-14, have steadily increased (CDPHE 2010). In July 2008, the concentration of PCE in S-14 rose above the national drinking water standard or Maximum Contaminant Level (MCL) of 5.0 micrograms per liter (µg/L).

Figure 1: Concentration of PCE at the Security Water District's Municipal Well S-14



Although the S-14 well has been removed from the SWD's water distribution system, rising levels of PCE have been documented in three other wells that are still operating: CS-08, CS-10 and CS-13 (CDPHE 2010). Table 1 shows the maximum levels of PCE that have been detected at these four municipal wells. PCE has also been detected in a well used to supply drinking water to workers at the Transit Mix Aggregate facility which is just north of S-14 (CDPHE 2010). Like S-14, this well has since been taken off line.

Table 1: Maximum PCE Concentrations in Security Water District's Municipal Wells

Well ID	Sample Date	PCE (µg/L)	Maximum Contaminant Level (MCL)
CS-08	08/10/2010	5.1 µg/L	5.0 μg/L
CS-10	12/01/2009	5.7 µg/I.	5.0 μg/L
CS-13	07/12/2010	1.5 µg/L	5.0 μg/L
S-14	07/12/2010	10.0 µg/L	5.0 μg/L

Source: CDPHE, 2010

The Colorado Department of Public Health and Environment (CDPHE), in conjunction with EPA Region 8's Site Assessment Team, prepared a Preliminary Assessment Report in 2008 (CDPHE 2008) and a Site Investigation Report in 2010 (CDPHE 2010). Sampling results from these efforts identified a PCE plume in the ground water that extends up gradient of well S-14 in a northerly direction (CDPHE 2010). The terminus of this plume appears to be located approximately one mile northeast of the S-14 well at the King's One-Hour Dry Cleaner, 3217 South Academy Boulevard (CDPHE 2010). A map of this PCE plume is provided in Attachment A.

King's One-Hour Dry Cleaner is being addressed as a potential source of the ground water contamination under an approved Corrective Action Plan with CDPHE's Resource Conservation and Recovery Act (RCRA) Program. CDPHE is currently exercising their statutory authorities under RCRA by coordinating both investigation activities and the potential remediation activities of the Potential Responsible Party (PRP). CDPHE is also coordinating the relevant stakeholder group.

Should CDPHE's RCRA efforts prove unsuccessful, EPA may need to take removal and/or remedial action in the future to address the source of the contamination. However, at this time, EPA is supporting CDPHE's current efforts, and the scope of the Removal Action described herein is limited to preventing PCE from entering Security's water distribution system.

2. Physical Location

The contaminated wells that have been identified (CS-8, CS-10, CS-13 and S-14) are four of 22 wells that provide water to the residents of Security, CO. Security Water District (SWD) estimates that these 22 wells provide 69 percent of their residents' domestic water demands (CDPHE 2010). Approximately 19,000 people live in Security and the community is characterized by young families whose income is associated with the Fort Carson Army Base. Forty-four percent (44 percent) of all households in Security have children under the age of 18 (Wikipedia Website 2011).

The Widefield PCE Site derives its name from the fact that the four contaminated wells draw water from the Widefield Aquifer, a highly productive water source located in the southern portion of the Colorado Springs metropolitan area. Security is one of four communities or water districts that draw water from this aquifer:

- City of Fountain
- Security Water District
- Stratmoor Hills Water District
- Widefield Water and Sanitation District

These entities have joined Colorado Springs in a legal agreement known as the Restatement of Stipulations Concerning the Widefield Aquifer Plan which enforces rates of water usage and prohibits the development of additional wells (Joint Motion 2009). The City of Colorado Springs owns three of the contaminated wells (CS-8, CS-10 and CS-13) and leases these wells to the SWD (Water Supply Agreement 1998). The current 15 year lease is due to expire on December 31, 2012, but all indications are that the lease shall be renewed for another 15 years.

Due to the legally binding stipulations to the Widefield Aquifer Plan, SWD's water lease

with Colorado Springs and the general scarcity of water rights along Colorado's Front Range, alternate sources of municipal water that SWD could exploit are limited, if not non-existent.

3. Site Characteristics

The results of the 2008 Preliminary Assessment and the 2010 Site Investigation indicate that this Site's PCE ground water plume appears to extend down gradient within the Widefield Aquifer from the King's One-Hour Dry Cleaner, beneath the Transit Mix. Aggregate facility (which includes a sand quarry, settling impoundment and concrete mixing plant), and fans out under a variety of mixed residential and commercial areas (see Attachment A) (CDPHE 2010). CDPHE is performing additional sampling to fully characterize this plume.

Another well characterized, but a distinctly different PCE ground water plume affecting the Widefield Aquifer, is known as the Schlage Lock Company PCE plume. This plume is located east of Academy Boulevard and is sourced to the Schlage Lock Company's historic release of PCE into the aquifer. Extensive and ongoing work has been performed to characterize and monitor the extent of the PCE ground water plume emanating from Schlage Lock Company. The current sampling data show that Schlage Lock Company PCE plume is not the source of the contamination found at the four contaminated wells (CS-8, CS-10, CS-13 and S-14) (CDPHE 2010).

4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant or Contaminant

Sampling evidence shows that the King's One-Hour Dry Cleaner is the most likely source of the contamination. Six ground water monitoring wells installed around this site reveal that a release to ground water has occurred (CDPHF 2010). In addition, a 2005 Phase I Environmental Site Assessment Report on the Mission Trace Shopping Center (location of King's One-Hour Cleaner) by EBI Consulting refers to a prior subsurface assessment that was performed on the King's One Hour Cleaners tenant space by Fluor Daniel-GTI, Inc., in 1997 (EBI 2005). In this report, two borings were advanced inside the dry cleaner space and soil samples were collected at a depth of 10 feet below the ground surface (bgs). PCE was detected in these soil samples at concentrations of 4,100 parts per billion (ppb) (EBI 2005). Cis 1,2-Dichloroethane, a "daughter product" of PCE, was reported in the soil at concentrations ranging from 60 to 480 ppb (EBI 2005).

Based on the results of CDPHE's 2008 Preliminary Assessment Report, the owner of Mission Trace Shopping Center hired Terracon Inc. to perform an Integrated Corrective Action Plan under the direction of CDPHE's RCRA program (CDPHE 2010). This study affirms that the King's One-Hour Dry Cleaner is a source of PCE contamination (Terracon 2010). Terracon's investigation revealed shallow soils within the dry cleaning building that were contaminated with PCE at a concentration of 1,930 miligrams per kilogram (mg/kg). A water sample, possibly from a sewer line inside the building, contained 243,000 µg/L of PCE (Terracon 2010).

PCE and its daughter products, TCE, DCE, and vinyl chloride, are all hazardous substances as defined by 101(14) of CERCIA. PCE was introduced as a dry cleaning solvent in the U.S. in 1934 and is still widely used by the industry. PCE is often referred to as "petc" or "dry-cleaning fluid" by the general public. According to EPA's Technology

Transfer Network Air Toxics website (EPA Website), EPA considered the epidemiological and animal evidence associated with PCE in the mid 1980's and classified PCE as an intermediate (between probable and possible) human carcinogen (i.e., Group B/C).

The density of PCE is 1.6 grams per cubic centimeter and the solubility in water at 20 degrees centigrade is 0.015 grams per 100 milliliters or 150,000 µg/L (IPCS Website). With a density greater than water, PCE in free product form represents a Dense Non-Aqueous Phase Liquid (DNAPL). DNAPLs tend to migrate downward in the water column until interrupted by a less permeable unit, such as a clay lens, or in the case of the Widefield PCE site, the top of the weathered Pierre Shale (CDPHE 2010). Once DNAPL intercepts the less permeable unit, it will tend to follow the slope of this unit.

Although CDPHE is still investigating, EPA has limited information on how the release of chlorinated solvents may have occurred at this Site. Dry cleaning facilities are common sources of PCE in the environment in urbanized areas. Although various contaminant release mechanisms may be associated with historic dry cleaning and dyeing operations, one of the most obvious sources would have been the underground storage tanks and above ground storage tanks, commonly used at historic dry cleaning facilities. Additionally, inadvertent spills and improper disposal of spent solvents can cause ground water contamination, especially if the aquifer is relatively shallow. Improper disposal of spent dry cleaning solvents can be as simple as dumping on the land surface, spilling on concrete surfaces, disposal into storm water drains, and even burial (CDPHE 2010).

5. NPL Status

The Site is not currently on the National Priorities List (NPL) but a Site Assessment has been completed and, depending upon the outcome of CDPHE's existing RCRA actions and the PRP's approved Corrective Action Plan, the Site may be listed in the future.

B. Other Actions to Date

1. Previous actions

There have been no previous Removal Actions at this Site.

2. Current actions

There are no current Removal Actions at this Site.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

CDPHE, through a cooperative agreement with EPA Region 8's Site Assessment Team, completed both a Preliminary Assessment and a subsequent Site Investigation at the Site. CDPHE has approved a RCRA Corrective Action Plan developed by the PRP to address the source of the contamination. However, both CDPHE and the Security Water District (SWD) have requested immediate assistance from EPA to protect public health and prevent the PCE contaminant from entering into Security's municipal water supply.

EPA has kept the State, SWD and other local agencies apprised of its potential removal activities.

2. Potential for continued State/Local Response

In discussions with both the State and SWD, both parties have indicated that they do not have the necessary resources to install a treatment system or otherwise prevent PCE from entering the water distribution system. However, SWD has demonstrated the capability and willingness to maintain a treatment system if it is constructed. EPA anticipates that SWD's maintenance costs for the proposed water treatment system will be \$30,000 - \$50,000 per year.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Site present a threat to public health and welfare and meet the criteria for initiating a Removal Action under Section 300.415(b)(2) of the NCP.

A. Threats to Public Health or Welfare

Per 40 CFR 302.4, PCE (also known as tetrachloroethylene, perchloroethylene, or perc) is a listed hazardous substance and has been detected in unacceptably high concentrations at municipal water wells in Security, Colorado. The Site conditions present a direct threat to public health and welfare as PCE has entered the municipal water system. Exposure to this chemical could lead to both acute and chronic health effects including cancer, reproductive issues and birth defects (EPA Website). Because of the dangerous nature of the contaminant involved and the concentrations in which it has been found on the Site, conditions present a threat to public health and welfare and meet the criteria for initiating a Removal Action under 40 CFR §300.415(b)(2) of the NCP.

All of the factors from 40 CFR §300.415(b)(2) of the NCP were considered but the factors cited below form the basis for EPA's determination of both the threat presented and the appropriate action to be taken:

(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;

Sampling data indicate that PCE has migrated into the Widefield Aquifer. This aquifer is the primary source of drinking water for the community of Security, Colorado. Samples from three SWD wells have already exceeded the MCL for PCE. Since only one of SWD's contaminated wells has been taken off line, it must be assumed that PCE has already entered the municipal water system.

Empirical evidence indicates that concentrations of PCE will continue to rise. Most PCE DNAPLs undergo only limited degradation in the subsurface and persist for long periods while slowly releasing soluble constituents to ground water through dissolution. Dissolution may continue for hundreds of years or longer under natural conditions before all the DNAPL is dissipated and concentrations of soluble organics in ground water return to background levels.

(vii) The (lack of) availability of other appropriate federal or state mechanisms to respond to the release,

No other local, state, or federal agency is in the position, or has the resources, to implement an effective response action to address the on-going threats presented at the Site.

B. Threats to the Environment

Specific threats to wildlife and plants have not been identified at this time. The primary purpose for conducting the Removal Action is to protect the Security drinking water supply which provides potable water that is used for pets, livestock and other animals which might be vulnerable to the toxic and carcinogenic effects of the hazardous substance.

IV. ENDANGERMENT DETERMINATION

PCE exposure is associated with central nervous system effects such as dizziness, headaches, nausea, and liver and kidney toxicity (EPA Website). It has also been shown to be carcinogenic in animals, causing liver and kidney tumors (EPA Website). PCE will eventually degrade to TCE, DCE, and vinyl chloride via the loss of chlorine molecules. These degradation products are also associated with liver and kidney toxicity and central nervous system effects, as well as reproductive effects and lung cancer (EPA Website).

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, present a threat to public health, welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of this Removal Action is to reduce exposure to PCE through the drinking water supply by installing a treatment facility to address water from the 4 contaminated wells: CS-8, CS-10, CS-13 and S-14. The facility would be installed on property owned by SWD adjacent to their municipal water well S-12 (see Figure 2) and would rely on air stripping technologies to remove the existing contaminants. This facility would lower levels of PCE in the distribution system to below levels of detection $(0.5 \,\mu g/L)$.

Supply pipes from CS-8, CS-10 and CS-13 to S-12 are already in place and SW-12 is already connected to the water distribution system. A new supply pipe will need to be established to connect S-12 to S-14. The distance between S-12 and S-14 is approximately ¼ mile (see Figure 2).

Since the water treatment facility would be installed on property owned by SWD and because this property has a sufficient setback, no disruption to the surrounding residences is anticipated.

Once constructed, SWD would assume all responsibility for operations and maintenance.

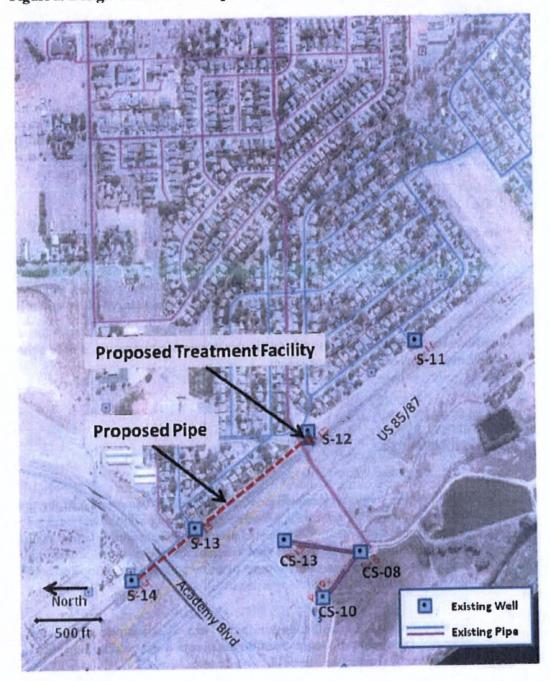


Figure 2: Design Overview for Proposed Removal Action in Security, CO

2. Contribution to Remedial Performance

CDPHE has completed both a Preliminary Assessment and a Site Investigation under a cooperative agreement with EPA. Furthermore, CDPHE is currently exercising their statutory authorities under RCRA to coordinate the potential remediation activities of the PRP. In 2010, CDPHE approved a Corrective Action Plan that was developed by the PRP.

These efforts and the Removal Action proposed in this document can only help mitigate the existing contamination. These activities and the proposed Removal Action will not interfere with any future Superfund remediation activities should they occur in the future.

3. Engineering Evaluation/Cost Analysis (EE/CA)

This is a Time-Critical Removal Action; thus, an EE/CA is not required.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

As this action is being conducted as a Time-Critical Removal, all federal and state ARARs may not have been identified at this time. The ARARs identified to date are provided in Attachment B. In accordance with the NCP, all ARARs for the Site will be attained to the extent practicable, given the scope of the project and the urgency of the situation as they are identified.

5. Project Schedule

It is anticipated that this Removal Action will begin in June 2011 and be completed no later than June 2012.

B. Estimated Costs

EXTRAMURAL COSTS:

Regional Removal Allowance Costs

Air Stripping System	\$ 300,000
Facilities and Infrastructure	450,000

Other Extramural Costs not Funded by Regional Removal Allowance

Total START Fotal CLP	\$	30,000 5,000
Subtotal Extramural Costs	\$	785,000
20% Contingency	\$_	157,000
TOTAL REMOVAL PROJECT CEILING	R	942 000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase the public health risks to the local population and environment posed by PCE and its daughter products in soils and shallow ground water.

VII. OUTSTANDING POLICY ISSUES

This removal does not set a precedent or constitute a nationally significant issue.

VIII. ENFORCEMENT

Several potentially responsible parties have been identified at this Site, including: the former operator (who has fled the country) and the current property owner. The PRPs have asserted a limited ability to pay for response costs. A confidential Enforcement Addendum, which sets forth EPA's enforcement strategy for this Site has been prepared and placed in the Site file.

Removal Project Ceiling	\$ 942,000
EPA's Direct Intramural Costs	50,000
Subtotal	\$ 992,000
Regional Indirect Costs (35%)	\$ 347,200
Estimated EPA Costs for the Removal Action	\$ 1,339,200

The total EPA costs for this Removal Action, based on full-cost accounting practices that will be eligible for cost recovery, are estimated to be \$1,339,200. Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a Removal Action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

X. RECOMMENDATION

This decision document represents the selected Removal Action for the Widefield PCE Site in Security, El Paso County, Colorado, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a Removal, and I recommend your approval of the proposed Removal Action. The total project ceiling will be \$942,000; of this amount, an estimated \$750,000 comes from the Regional removal allowance.

Approve:	David Ostrander, Director	Date: 6/15/11
	Preparedness, Assessment & Emerge	ency Response Programs
Disapprove		Date:
-	David Ostrander, Director Preparedness, Assessment & Emerge	ency Response Programs

Attachments: Attachment A - Map of PCE Plume

Attachment B - Applicable or Relevant and Appropriate Requirements

REFERENCES

CDPHE 2008: Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division, 2008, Preliminary Assessment, Perchloroethene in Municipal Well S-14, Widefield Aquifer, Security, El Paso County, Colorado, CERCLIS ID# CON000802729, July 16, 2008.

CDPHE 2010: Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division (HMWMD). 2010. Site Inspection Analytical Results Report – Final, Widefield PCE - CON000802729, El Paso County, Colorado, November, 2010

EBI 2005: EBI Consulting. Phase I Environmental Site Assessment, Mission Trace Shopping Center, September 23, 2005.

Joint Motion 2009: Joint Motion for the Application of Water Rights. 2009. Golorado Pueblo County District Court, 10th Judicial District, Filing ID: 25340509, Filing Date: May 26, 2009.

Terragon 2010: Terragon Consultants, Inc. 2010. Integrated Corrective Action Plan, Kings One Hour Cleaners, September 30, 2010.

Water Supply Agreement 1998: Water Supply Agreement. 1998. Colorado Springs Utilities and Security Water District, February 24, 1998.

WEBSITE REFERENCES

EPA Website: U.S. Environmental Protection Agency, Technology Transfer Network Air Toxics Website for Tetrachloroethylene (Perchloroethylene) http://www.epa.gov/ttn/atw/hlthef/tet-ethy.html

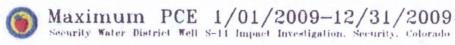
ICPS Website: International Programme on Chemical Safety, Chemical Information (INCHEM) Website for Tetrachloroethylene http://www.inchem.org/documents/icsc/icsc/cics0076.htm

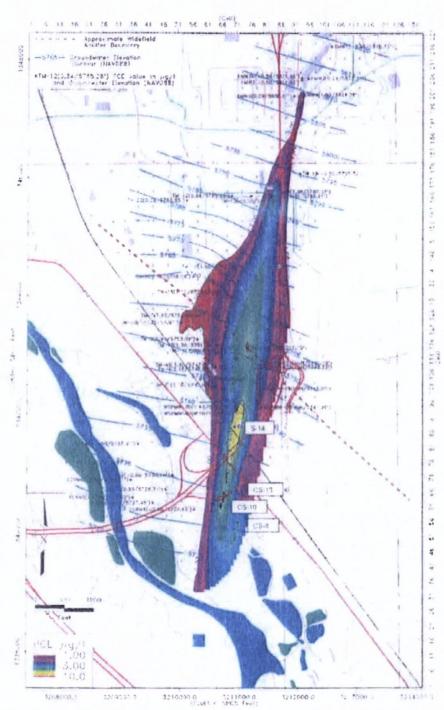
Wikipedia Website: Wikipedia Website for Security-Widefield, Colorado http://en.wikipedia.org/wiki/Security-Widefield, Colorado

SUPPLEMENTAL DOCUMENTS

Support/reference documents which may be helpful to the reader and/or have been cited in the report may be found in the Administrative Record File for the Widefield PCE Site at the Superfund Records Center for Region VIII EPA, 1595 Wynkoop Street, Denver, Colorado 80202. An additional copy of the Administrative Record File will be placed at a repository near the Site, the location of which is to be determined.

Attachment A Map of PCE Plume





Attachment B Applicable or Relevant and Appropriate Requirements

Standard, Requirement, Criteria, or Limitation	Citation	Description	Applicable or Relevant and Appropriate	Comments
FEDERAL				
National Primary Drinking Water Regulations (MCLs)	40 CFR Part 141, Subpart B pursuant to 42 USC §§ 300g-1 and 300j-9.	Regulates drinking water quality.	Applicable	
STATE				
Colorado Water Quality Control Act. Storm Water Discharge Regulations	5 CCR 1002-61	Regulates discharge of storm water during construction activities.	Applicable	Best Management Practices will be implemented to control storm water discharges or run-off during Removal Activities.
Colorado Primary Drinking Water Standards	5 CCR 1003-1	Establishes health-based standards for public water systems.	Applicable	The proposed Removal Action will comply with Colorado's health-based drinking water standards.
Basic Standards for Groundwater: WQCD Reg. No. 41	5 CCR 1002-41	Sets standards for contaminants in groundwater.	Not Applicable	The scope of this Removal Action does not address the source of the contamination nor the contamination of the aquifer itself.
Colorado Hazardous Waste Act (CHWA)	6 CCR 1007-3	Regulates generators, transporters, owners or operators of hazardous waste treatment, storage, or disposal facilities.	Possibly Applicable	To the extent that the contamination can be associated with a discarded or unused product that poses a threat to human health, EPA's Removal Action will comply with the CHWA.
Colorado Air Pollution Prevention and Control Act	5 CCR 1001-3 and 5 CCR 1001-10 Part C(I) and (II), Regulation 8, pursuant to CRS §§ 25-7-101 et. seq.	Regulates fugitive emissions during construction of a treatment facility.	Applicable	Superfund actions do not require permits; however, fugitive emissions during construction will be controlled by implementing dust control measures during any dirt moving or construction activities.
		Regulates fugitive emissions during operation of a treatment facility.	Possibly Applicable	Superfund actions do not require permits: however, EPA will meet all substantive requirements and provide assistance to the Security Water District if the District requires a permit for long term operation.
Colorado Emission Standards for Hazardous Air Pollutants	CRS § 25-7-108, 5 CCR 1001-10, Reg. 8	Regulates emission of hazardous chemicals to the atmosphere.	Possibly Applicable	Superfund actions do not require permits; however, EPA will meet all substantive requirements and provide assistance to the Security Water District if the District requires a permit for long term operation.
Colorado Noise Abatement Statute	CRS §§ 25-12-1010, et. seq.	Regulates permissible noise levels.	Applicable	Noise controls will be implemented throughout the Removal Action; most noticeable work is expected to occur between 0700 and 1900 hrs.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 8** 1595 Wynkoop Street **DENVER, CO 80202**

Ref: 8EPR-ER

JUN 2 0 2013

ACTION MEMORANDUM

DATE:

June 20, 2013

SUBJECT:

Request for a Ceiling Increase for the Time-Critical Removal Action at the Widefield

PCE Site. Security, El Paso County, Colorado

FROM:

Paul Peronard, On-Scene Coordinator M MCW for Paul Peronard

Emergency Response Unit

THRU:

Laura Wiliams, Supervisor

1. Williams **Emergency Response Unit**

TO:

David Ostrander, Director

Emergency Response & Preparedness Program

I. **PURPOSE**

The purpose of this Action Memorandum is to request and document approval of a ceiling increase for the time-critical removal action selected in the June 1, 2011, Action Memorandum and described herein. This removal action primarily addresses the contamination of a municipal water supply by chlorinated solvents in the Colorado Springs suburb of Security, Colorado, the Widefield PCE Site (Site). The chlorinated solvents were likely released from a dry cleaning business to the Widefield Aquifer, the source of Security's water supply. Tetrachloroethylene (PCE) is the primary contaminant of concern.

Conditions existing at this Site present a threat to public health and meet the criteria for initiating a removal action under 40 CFR, Section 300.415(b)(2) of the National Contingency Plan (NCP). The removal action involves construction of a water treatment facility to remove the contaminant of concern before it enters the public water supply. Operation and maintenance of this facility will be the responsibility of the Security Water District (SWD).

During the course of implementing the planned removal action the Colorado Department of Public Health and Environment (CDPHE) informed the Agency that the plans and specifications for the proposed water treatment system may not comply with the 1997 version of the State of Colorado Design Criteria for Potable Water Systems and the Draft State of Colorado Design Criteria for Potable Water Systems presently being developed by the Water Quality Control Division of CDPHE. These design criteria are potential To Be Considered* (TBC) criteria for this removal action. After discussion with CDPHE and review of the draft material, the Agency

*To-be-Considered material (TBCs) are non-promulgated advisories or guidance issued by federal or state government that are not legally binding and do not have the status of potential ARARs. However, in addition to ARARs, TBCs may be very useful in helping to determine what is protective at a site, or how to carry out certain actions or requirements.

has determined that certain of these provisions identified by CDPHE are TBC for this removal action. As a result, the Agency is proposing changes or upgrades to the piping, chlorination, and distribution system of the water treatment facility as originally designed for this removal action. These changes require an increase in the ceiling for this action.

Even with this ceiling increase, it is anticipated that this removal action will be less than 12-months and \$2 million and thus will not require an exemption from the statutory limits on a removal action. Based on the nature of the Site and the anticipated work, there are no nationally significant or precedent-setting issues associated with this removal action. Furthermore, this removal action will not establish any precedent for how future Site response actions will be taken and will not commit the United States Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.

II. SITE CONDITIONS AND BACKGROUND

Site Name:

Widefield PCE Site

Superfund Site ID:

08SQ

NRC Case Number:

CERLCIS Number:

CON000802729

Site Location:

Security, El Paso County, CO

Lat/Long:

Potentially Responsible Party (PRP):

NPL Status:

The Site is not currently on the NPL

Removal Start Date:

A. Site Description

1. Removal Site Evaluation

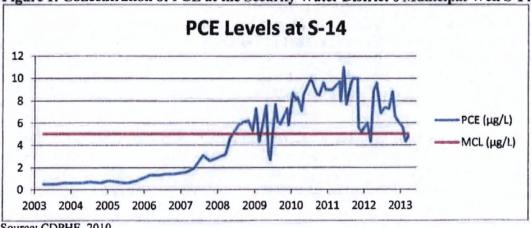
The CERCLIS ID for this Site is CON000802729. Site conditions are such that this removal action is classified as time-critical.

Contamination at the Widefield PCE Site was first identified in 2003 when the Security Water District (SWD) detected tetrachloroethylene (also known as perchloroethylene, perc, or PCE) in one of its 22 municipal water supply wells. Periodic sampling results from 2003 through 2010 indicated that PCE levels in this well, identified as S-14, have steadily increased (CDPHE 2010). In July 2008, the concentration of PCE in S-14 rose above the national drinking water standard or Maximum Contaminant Level (MCL) of 5.0 micrograms per liter (µg/L).

As a result, the S-14 well was removed from the SWD's water distribution system in 2008. In addition, rising levels of PCE had also been documented in three other wells that are still operating: CS-08, CS-10 and CS-13 (CDPHE 2010). Table 1 shows the maximum levels of PCE that have been detected at these four municipal wells. PCE has also been detected in a well used to supply drinking water to workers at the Transit Mix Aggregate facility which is just north of S-14 (CDPHE 2010). Like S-14, this well has since been taken off line.

CDPHE, in conjunction with EPA Region 8's Site Assessment Team, prepared a Preliminary Assessment Report in 2008 (CDPHE 2008) and a Superfund Site Investigation Report in 2010 (CDPHE 2010). Sampling results from these efforts identified a PCE plume in the





Source: CDPHE, 2010

groundwater that extends up gradient of well S-14 in a northerly direction (CDPHE 2010). The terminus of this plume appears to be located approximately 1-mile northeast of the S-14 well at the King's One-Hour Dry Cleaner, 3217 South Academy Boulevard (CDPHE 2010). A map of this PCE plume is provided in Attachment A.

Table 1: Maximum PCE Concentrations in Security Water District's Municipal Wells

Well ID	Sample Date	PCE (µg/L)	Maximum Contaminant Level (MCL)
CS-08	08/10/2010	5.1 μg/L	5.0 μg/L
CS-10	12/01/2009	5.7 μg/L	5.0 μg/L
CS-13	07/12/2010	1.5 μg/L	5.0 μg/L
S-14	10/26/2011	10.0 μg/L	5.0 μg/L

Source: CDPHE 2010

The King's One-Hour Dry Cleaner facility is being addressed as the potential source of the groundwater contamination by CDPHE under a Resource Conservation and Recovery Act (RCRA) Order. In 2011 and 2012, under CDPHE direction, the property owner of the strip mall where the King's One-Hour Cleaner was located, undertook the excavation of surface and sub-surface soils that contained high levels of PCE. The original Action Memorandum was signed on June 1, 2011. It was hoped that the State actions would lower the level of PCE entering, and in, the Widefield Aquifer. Partially based on the State actions, EPA delayed the start of the planned removal. Indeed, in the spring of 2012, levels of PCE in S-14 dropped to below the MCL (SWD Data, 2012). Unfortunately, by the summer of 2012 the concentration of PCE rose back above the MCL. As illustrated in Figure 1, levels of PCE in S-14 continue to fluctuate around or above the MCL. An updated spreadsheet containing all of the VOC data collected by the SWD can be found in the Site Administrative Record.

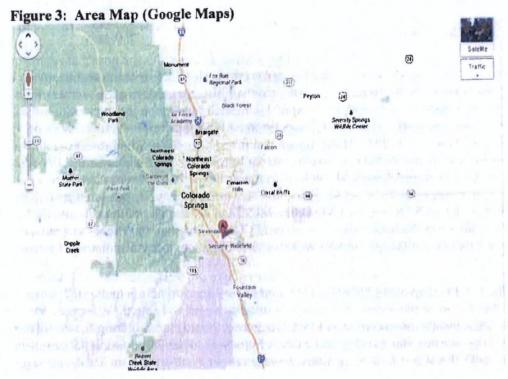
Based on the continuing presence of PCE at or above the MCL even after the actions taken under the direction of the CDPHE, EPA initiated its removal action on April 1, 2013. One of the early steps of this action was to start to arrange piping to bring the affected water from the various wells into a centralized PCE Treatment Plant (Plant). During the installation of the water line that was to bring water down from S-14 to the Plant the ERRS contractor encountered two previously unmarked sewage crossings, as well as an active septic drain field.

As identified in the original Action Memorandum for the Widefield PCE Site (EPA 2011), the CPDWS (5 CCR 1003-1) was identified as an applicable ARAR for the removal action. These standards not only include MCLs for particular substances (e.g., 5.0 ppb for PCE) but also include construction criteria that are potential TBCs for the water treatment facility. Likewise, the other PCE affected wells (CS-8, CS-10, and CS-13) are similarly constructed and, the area is generally used as agricultural property.

CDPHE has advised EPA that, in order for the plant to meet these construction criteria, upgrades to the piping, chlorination, and distribution system would be needed. In addition, CDPHE has advised EPA that such upgrades are necessary for approval of the long term operation and use of this system as a public water supply. The Agency has determined that certain provisions of these criteria are TBC, in that the well screens for the three SWD wells in the area (S-14, S-13, and S-12) are all within 40 feet of the ground surface and thought to be influenced by surface water.

2. Physical Location

The contaminated wells that have been identified (CS-8, CS-10, CS-13 and S-14) are four of twenty-two wells that provide water to the residents of Security, CO. SWD estimates that these twenty-two wells provide 69% of their residents' domestic water demands (CDPHE 2010). Approximately 19,000 people live in Security and the community is characterized by young families whose income is associated with the Fort Carson Army Base. Forty-four percent (44%) of all households in Security have children under the age of 18 (Wikepedia Website 2011).



The Widefield PCE Site derives its name from the fact that the four contaminated wells draw water from the Widefield Aquifer, a highly productive water source located in the southern portion of the Colorado Springs metropolitan area. Security is one of four communities or

water districts that draw water from this aquifer:

- City of Fountain
- Security Water District
- Stratmoor Hills Water District
- Widefield Water and Sanitation District

These entities have joined Colorado Springs in a legal agreement known as the Restatement of Stipulations Concerning the Widefield Aquifer Plan which enforces rates of water usage and prohibits the development of additional wells (Joint Motion 2009). The city of Colorado Springs owns three of the contaminated wells (CS-8, CS-10 and CS-13) and leases these wells to the SWD (Water Supply Agreement 1998).

Due to the legally binding stipulations to the Widefield Aquifer Plan, the SWD's water lease with Colorado Springs and the general scarcity of water rights along the Front Range, alternate sources of municipal water that the SWD could exploit are limited.

3. Site Characteristics

The results of the 2008 Preliminary Assessment (CDPHE 2008) and the 2010 Superfund Site Investigation (CDPHE 2010) indicate that this Site's PCE groundwater plume appears to extend down gradient within the Widefield Aquifer, from the King's One-Hour Dry Cleaner, beneath the Transit Mix Aggregate facility (which includes a sand quarry, settling impoundment and concrete mixing plant), and fans out under a variety of mixed residential and commercial areas (CDPHE 2010). See Attachment A.

Another well characterized, but distinctly different PCE groundwater plume affecting the Widefield Aquifer, is known as the Schlage Lock Company PCE plume. This plume is located east of Academy Boulevard and is sourced to the Schlage Lock Company's historic release of PCE into the aquifer. Extensive and ongoing work has been performed to characterize and monitor the extent of the PCE groundwater plume emanating from Schlage Lock Company. The current sampling data shows that Schlage Lock Company PCE plume is not the source of the contamination found at the four contaminated wells (CS-8, CS-10, CS-13 and S-14) (CDPHE 2010).

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Sampling evidence shows that the King's One-Hour Dry Cleaner is the most likely source of the contamination. Six groundwater monitoring wells installed around this Site reveal that a release to groundwater has occurred (CDPHE 2010). In addition, a 2005 Phase I Environmental Site Assessment Report on the Mission Trace Shopping Center (location of King's One-Hour Cleaner) by EBI Consulting refers to a prior subsurface assessment that was performed on a King's One Hour Cleaners tenant space by Fluor Daniel-GTI, Inc., in 1997 (EBI 2005). In this report, two borings were advanced inside the dry cleaner space and soil samples were collected at a depth of 10 feet below the ground surface (bgs). PCE was detected in these soil samples at concentrations of 4,100 parts per billion (ppb) (EBI 2005). Cis 1,2-Dichloroethene, a "daughter product" of PCE, was reported in the soil at concentrations ranging from 60 to 480 ppb (EBI 2005).

Based on the results of this Phase I Assessment, the owner of Mission Trace Shopping Center

hired Terracon Inc., to perform an Integrated Corrective Action Plan (CAP) under the direction of CDPHE's RCRA program. This study affirms that the Kings One-Hour Dry Cleaner is a source of PCE contamination (Terracon 2010). Terracon's investigation revealed shallow soils within the dry cleaning building that were contaminated with PCE at a concentration of 1,930 miligrams per kilogram (mg/kg). A water sample possibly from a sewer line inside the building contained 243,000 µg/L of PCE (Terracon 2010).

PCE and its daughter products, TCE, DCE and vinyl chloride, are all hazardous substances as defined by 101(14) of CERCLA. PCE was introduced as a dry cleaning solvent in the U.S. in 1934 and is still widely used by the industry. PCE is often referred to as "perc" or "drycleaning fluid" by the general public. According to EPA's Technology Transfer Network Air Toxics Website (EPA Website), EPA considered the epidemiological and animal evidence associated with PCE in the mid 1980's and classified PCE as an intermediate (between probable and possible) human carcinogen (i.e., Group B/C).

The density of PCE is 1.6 grams per cubic centimeter and the solubility in water at 20 degrees centigrade is 0.015 grams per 100 milliliters or 150,000 µg/L (IPCS Website). With a density greater than water, PCE in free product form represents a Dense Non-Aqueous Phase Liquid (DNAPL). DNAPLs tend to migrate downward in the water column until interrupted by a less permeable unit, such as a clay lens, or in the case of the Widefield PCE Site, the top of the weathered Pierre Shale (CDPHE 2010). Once DNAPL intercepts the less permeable unit it will tend to follow the slope of this unit.

EPA has limited information on how the releases of chlorinated solvents may have occurred at this Site. Dry cleaning facilities are common sources of PCE in the environment in urbanized areas. Although various contaminant release mechanisms may be associated with historic dry cleaning and dyeing operations, one of the most obvious sources is the underground storage tanks (USTs) and above ground storage tanks (ASTs), commonly used at historic dry cleaning facilities. Additionally, inadvertent spills and improper disposal of spent solvents can cause groundwater contamination, especially if the aquifer is relatively shallow. Improper disposal of spent dry cleaning solvents can be as simple as dumping on the land surface, spilling on concrete surfaces, disposal into storm water drains, and even burial (CDPHE 2010).

5. NPL Status

The Site is not currently on the National Priorities List (NPL) but a Site Assessment has been completed and, depending upon the outcome of the CDPHE's existing RCRA Order, the Site may be listed in the future.

6. Maps, Pictures, Other Geographic Representations

A map of the PCE Plume is available as Attachment A.

B. Other Actions to Date

1. Previous Actions

EPA, through its Emergency Response and Rapid Services (ERRS) contract has sized and designed an air-stripper system to remove the PCE. Removal action was initiated on April 1, 2013.

2. Current Actions

The removal action at this Site is currently on-going.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

CDPHE; through a cooperative agreement with EPA Region 8's Site Assessment Team, completed both a Preliminary Assessment and a subsequent Superfund Site Investigation at the Site. CDPHE has issued a RCRA Order to address the source of the contamination. The on-going presence of PCE in the SWD water supply has greatly hampered SWD's ability to supply water. Because of this, the SWD has requested that EPA continue its work to protect public health and prevent the PCE contaminant from entering into Security's municipal water distribution system. The SWD has also agreed to provide the upgraded piping associated with the CS wells and S-12.

EPA has kept the State, SWD and other local agencies apprised of its removal activities.

2. Potential for Continued State/Local Response

Neither the State nor SWD has the necessary resources to prevent PCE from entering the distribution network by installing a treatment system. However, SWD has demonstrated the capability and has committed to operating and maintaining a treatment system if it is constructed and capable of being approved by the State. EPA anticipates that the SWD's maintenance costs for the proposed water treatment system will be \$30,000 - \$50,000 per year.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Site present a threat to public health and welfare and meet the criteria for initiating a removal action under Section 300.415(b)(2) of the NCP.

A. Threats to Public Health or Welfare

Per 40 CFR 302.4, PCE (also known as tetrachloroethylene, perchloroethylene, or perc) is a listed hazardous substance and has been detected in unacceptably high concentrations at municipal water wells in Security, Colorado. The Site conditions present a direct threat to public health and welfare as PCE has entered the municipal water system. Exposure to this chemical could lead to both acute and chronic health effects including cancer, reproductive issues and birth defects (EPA Website). Because of the dangerous nature of the contaminant involved and the concentrations in which it has been found on the Site, conditions present a threat to public health and welfare and meet the criteria for initiating a removal action under 40 CFR §300.415(b)(2) of the NCP.

All of the factors from 40 CFR §300.415(b)(2) of the NCP were considered but the factors cited below form the basis for EPA's determination of both the threat presented and the appropriate action to be taken:

(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems:

Sampling data indicate that PCE has migrated into the Widefield Aquifer. This aquifer is the primary source of drinking for the community of Security, Colorado. Samples from three of the SWD wells exceeded the MCL for PCE. Since only one of SWD's contaminated wells was taken off line, it must be assumed that PCE has already entered the municipal water system. Empirical evidence indicates that concentrations of PCE will continue to impact the affected wells. Most PCE DNAPLs undergo only limited degradation in the subsurface and persist for long periods while slowly releasing soluble constituents to groundwater through dissolution. Dissolution may continue for hundreds of years or longer under natural conditions before all the DNAPL is dissipated and concentrations of soluble organics in groundwater return to background levels.

(vii) The (lack of) availability of other appropriate federal or state mechanisms to respond to the release:

No other local, state, or federal agency is in the position, or has the resources, to implement an effective response action to address the on-going threats presented at the Site.

B. Threats to the Environment

Specific threats to wildlife and plants have not been identified at this time. The primary purpose for conducting the removal action is to protect the Security drinking water supply which provides potable water that is without doubt used for pets, livestock and other animals which are vulnerable to the toxic and carcinogenic effects of the hazardous substances present.

IV. ENDANGERMENT DETERMINATION

PCE exposure is associated with central nervous system effects such as dizziness, headaches, nausea, and liver and kidney toxicity (EPA Website). It has also been shown to be carcinogenic in animals, causing liver and kidney tumors (EPA Website). PCE will eventually degrade to TCE, DCE and vinyl chloride via the loss of chlorine molecules. These degradation products are also associated with liver and kidney toxicity and central nervous system effects, as well as reproductive effects and lung cancer (EPA Website).

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, present a threat to public health, welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of this removal action is to reduce exposure to PCE through the drinking water supply by installing a treatment facility to address water from the 4 contaminated wells: CS-8, CS-10, CS-13 and S-14. The facility will be installed on property owned by the Security Water District adjacent to their municipal water well S-12 (see Figure 2) and relies on air stripping technologies to remove the existing contaminants. This facility will lower levels of PCE in the distribution system to below levels of detection (0.5 ug/L). In undertaking these actions the EPA will also upgrade the piping, chlorination, distribution, and control systems

Supply pipes from CS-8, CS-10 and CS-13 to S-12 are being supplied by the SWD. EPA will design a control configuration that will allow these supply lines into either the PCE Treatment Plant, or directly into an EPA constructed clear well for chlorination. A new supply pipe will need to be established to connect S-12 to S-14. The distance between S-12 and S-14 is approximately ¼ mile (see Figure 2). The resulting treatment system will not only reduce the concentration of PCE in the drinking water supplied by the SWD to



below the MCL, it will also meet the specific criteria in State of Colorado Design Criteria for Potable Water Systems which CDPHE has identified as TBC requirements. Since the

water treatment facility will be installed on property owned by the Security Water District, and that this property has a sufficient setback, no disruption to the surrounding residences is anticipated.

Once constructed, SWD will assume all responsibility for operations and maintenance.

2. Contribution to Remedial Performance

CDPHE has completed both a Preliminary Assessment and a Superfund Site Investigation under a cooperative agreement with the EPA. Furthermore, CDPHE is currently exercising their statutory authorities under a RCRA order to coordinate the potential remediation activities of the Potential Responsible Party (PRP). These efforts and the removal action proposed in this document can only help mitigate the existing contamination. These activities and the proposed removal action will not interfere with any future Superfund remediation activities should they occur.

3. Engineering Evaluation/Cost Analysis (EE/CA)

This is a time-critical removal action; thus, an EE/CA is not required.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Removal actions conducted under CERCLA are required, to the extent practicable considering the exigencies of the situation, to attain ARARs. In determining whether compliance with an ARAR is practicable, the lead agency may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted. A table containing potential Site-specific ARARs was provided in the original Action Memorandum. After discussions with CDPHE, EPA is including specific provisions identified by CDPHE in the Draft State of Colorado Design Criteria for Potable Water Systems as TBC for this removal action.

5. Project Schedule

The removal action began in April 2013 and should be completed by November 2013.

B. Estimated Costs

EXTRAMURAL COSTS:

Regional Removal Allowance Costs

	Original Estimate	Current Estimate
Air Stripping System	\$ 300,000	\$ 350,000
Facilities and Infrastructure	450,000	*
Piping	*	350,000
Control system	*	100,000
Clear Well	*	400,000
Connections/Valves	*	100,000
Chlorination and Testing	g *	100,000
Building/Plumbing/Elec	etricity <u>*</u>	<u>400,000</u>
Sub-Total	\$750,000	\$ 1,800,000

Other Extramural Costs not Funded by Regional Removal Allowance

Total START Total CLP	Original Estimate \$ 30,000 	Current Estimate 0 0
Subtotal Extramural Costs	\$ 785,000	\$1,800,000
Contingency	\$157,000	\$ 190,000
Total Removal Project Ceiling	\$ 942,000	\$1,990,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase the public health risks to the local population and environment posed by PCE and its related products in soils and shallow groundwater.

VII. OUTSTANDING POLICY ISSUES

This removal does not set a precedent or constitute a nationally significant issue.

VIII. ENFORCEMENT

See the Enforcement Addendum prepared in conjunction with the June 1, 2001 Action Memorandum.

Removal Project Ceiling	\$ 1,990,000
EPA's Direct Intramural Costs	50,000
Subtotal	\$ 2,040,000
Regional Indirect Costs (35%)	\$ 714,000
Estimated EPA Costs for the Removal Action *	\$ 2,754,000

^{*} The total EPA costs for his removal action, based on full-cost accounting practices that will be eligible for cost recovery, are estimated to be \$2,754,000. Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective. October 2, 2000. These estimates do not include pro-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

X. RECOMMENDATION

This decision document represents the selected removal action for the Widefield PCE Site in Security, El Paso County, Colorado, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and, I recommend your approval of the proposed removal action. The total project ceiling will be

\$2,040,000; of this amount, an estimated \$1,990,000 comes from the Regional removal allowance.

David Ostrander, Director

Emergency Response & Preparedness Program

Disapprove: Date:

David Ostrander, Director

Emergency Response & Preparedness Program

Attachments: Attachment A - Map of PCE Plume

REFERENCES

CDPHE 2008: Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division, 2008, Preliminary Assessment, Perchloroethylene in Municipal Well S-14, Widefield Aquifer, Security, El Paso County, Colorado, CERCLIS ID# CON000802729, July 16, 2008.

CDPHE 2010: Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division (HMWMD), 2010, Site Inspection Analytical Results Report – Final, Widefield PCE - CON000802729, El Paso County, Colorado, November 2010.

EBI 2005: EBI Consulting, Phase I Environmental Site Assessment, Mission Trace Shopping Center, September 23, 2005.

Joint Motion 2009: Joint Motion for the Application of Water Rights, 2009, Colorado Pueblo County District Court, 10th Judicial District, Filing ID: 25340509, Filing Date: May 26, 2009.

Terragon 2010: Terragon Consultants, Inc. 2010, Integrated Corrective Action Plan, King's One Hour Cleaners, September 30, 2010.

Water Supply Agreement 1998: Water Supply Agreement, 1998, Colorado Springs Utilities and Security Water District, February 24, 1998.

WEBSITE REFERENCES

EPA Website: U.S. Environmental Protection Agency, Technology Transfer Network Air Toxics Website for Tetrachloroethylene (Perchloroethylene) http://www.epa.gov/ttn/atw/hlthef/tet-ethy.html

ICPS Website: International Programme on Chemical Safety, Chemical Information (INCHEM) Website for Tetrachloroethylene http://www.inchem.org/documents/icsc/icsc/eics0076.htm

Wikepedia Website: Wikepedia Website for Security-Widefield, Colorado http://en.wikipedia.org/wiki/Security-Widefield, Colorado

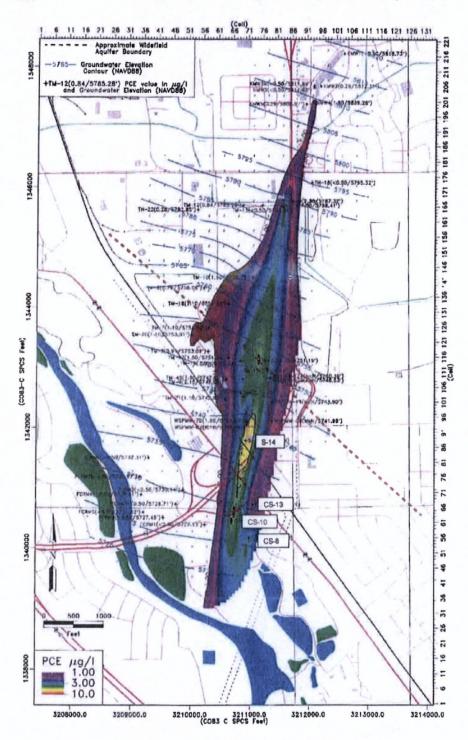
SUPPLEMENTAL DOCUMENTS

Support/reference documents which may be helpful to the reader and/or have been cited in the report may be found in the Administrative Record Files for the Widefield PCE Site at the Superfund Records Center for Region VIII, EPA, 1595 Wynkoop Street, Denver, Colorado 80202. An additional copy of the Administrative Record file will be placed at a repository near the Site, the location of which is to be determined.

Attachment A

Map of PCE Plume

Maximum PCE 1/01/2009-12/31/2009 Security Water District Well S-14 Impact Investigation, Security, Colorado



Maximum PCE 1/01/2009-12/31/2009

FIGURE 2 - PRINCIPIA MATHEMATICA PLUME MAP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

1595 Wynkoop Street DENVER, CO 80202-1129 Phone 800-227-8917 http://www.epa.gov/region08

SEP 2 6 2013

Ref: 8ENF-RC

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Registered Agent for Guardian Life Insurance Company of America (ID No. 19871008071) Division of Insurance 1560 Broadway Denver, CO 80202

Re: Request for Information Pursuant to Section 104(e) of CERCLA, Widefield PCE Site, SSID# 08-SQ, Colorado Springs and Security, Colorado.

Dear Sir or Madam:

This letter seeks your cooperation in providing information and documents relating to the Widefield PCE Site (Site) located in Colorado Springs and Security, Colorado. The U.S. Environmental Protection Agency (EPA) is investigating the identification, nature, and quantity of materials that have been generated, treated, stored or disposed at, or transported to, the Site; the nature or extent of the release of a hazardous substance, pollutant or contaminant at the Site; and information relating to the ability of persons to pay for or to perform a cleanup at the Site.

Pursuant to the authority of section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604, as amended, you are hereby requested to respond to the Information Request set forth in Enclosure 1, attached hereto.

The U.S. Environmental Protection Agency (ERA) is writing to you because the EPA has information that Guardian Life Insurance Company of America owned the Mission Trace Shopping Center located at 3205 South Academy Boulevard, Colorado Springs, Colorado, which is part of the Site. Investigations at the Site have shown that the groundwater beneath the shopping center is contaminated with Tetrachloroethylene (PCE), a chemical used in dry cleaning. The source of the PCE appears to be the Kings One Hour Cleaners which operated at the Mission Trace Shopping Center from about 1986 to 2010.

Please respond to the Information Request within 30 days. Failure to respond fully and truthfully, or to adequately justify your failure to respond, can result in an enforcement action by the EPA, pursuant to Section 104(e) of CERCLA, 42 U.S.C. Section 9604(e), and the imposition of penalties of up to \$37,500 per day of non-compliance. Please be further advised that providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501, et seq.

Your response to this request must be accompanied by a notarized certificate that is signed and dated by the person who is authorized by you to respond to this request. The notarized certificate must state that the response submitted to the EPA is complete and contains all documents and information responsive to this request that are known to you following a complete and thorough review of all information and sources available to you. A suggested format for the notarized certificate is included with this request as Enclosure 2.

Your response to this Information Request should be mailed to:

Virginia Phillips
U.S. EPA Region 8
Technical Enforcement Program, 8ENF-RC
1595 Wynkoop Street
Denver, Colorado 80202

The EPA strongly encourages you to give this matter your immediate attention and respond to the Information Request within the time specified above. If you have any legal or technical questions relating to the Information Request, you may consult with the EPA prior to the deadline specified above. Please direct legal questions to Richard Sisk, Attorney, at (303) 312-6638, and technical questions to Virginia Phillips, Enforcement Specialist, at (303) 312-6197.

Thank you for your cooperation in this matter.

Sincerely.

Kelce Land, Director

RCRA/CERCLA Technical Enforcement Program,

Office of Enforcement, Compliance,

And Environmental Justice

Andrea Madigan, Supervisory Attorney

Legal Enforcement Program,

Office of Enforcement, Compliance,

And Environmental Justice

Enclosures

cc: Carl Spreng, HMWMD, CDPHE (w/enclosures)
Richard Sisk, Esq., EPA Site Attorncy, Mail Code 8ENF-L (w/o enclosures)
Paul Peronard, EPA OSC, 8EPR-SA (w/o enclosures)
Virginia Phillips, EPA, 8ENF-RC (w/enclosures)
CERCLIS IMC (Dianna Lim), 8EPR-PS (w/o enclosures)

ENCLOSURE 1

INSTRUCTIONS FOR THE INFORMATION REQUEST WIDEFIELD PCE PLUME, SSID #08-SQ REQUEST #1

- 1. Please provide a separate narrative response to every Question and subpart of a Question set forth in this Information Request.
- 2. Precede each answer with the number of the Question to which it corresponds.
- 3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find, at any time after the submission of your response, that any portion of the information you submitted is false or misrepresents the truth, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
- 4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it corresponds.
- 5. The information requested herein must be provided even though you may contend that it includes possible confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information pursuant to Section 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. § 9604(e)(7)(E) and (F). To justify your claim for confidentiality, you must provide the following information for each document or information which you claim is confidential:
 - (a) The portions of the document information you claim should be entitled to confidential treatment;
 - (b) The period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - (c) Measures taken by you to guard against the undesired disclosure of the information to others:
 - (d) The extent to which the information has already been disclosed to others, including other state or federal agencies, and the precautions taken in connection therewith; and
 - (e) Any confidentiality determinations by the EPA or other state or federal agencies, and a copy of any such determinations or reference to them, if available.

If you assert that disclosure of the information would likely result in substantial harm to your business competitive position, what are those harmful effects, why should they be viewed as substantial, and what would the causal relationship be between disclosure and such harmful effects?

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information, and that you intend to continue to do so, and that the information is not and has not been obtainable by legitimate means without your consent. Information covered by such a confidentiality claim will be disclosed by the EPA only to the extent permitted by CERCLA Section 104(e). If no such confidentiality claim accompanies the information when it is received by the EPA, the information may be made available to the public by the EPA without further notice to you.

6. Information you submit in response to this Information Request may be disclosed to representatives of the United States, authorized under 40 C.F.R. Section 2.310(h), even if you assert a confidentiality claim. Please be advised that the EPA may disclose all responses to this Information Request to a private enforcement support services contractor employed by the EPA for the purpose of organizing and analyzing your response to this Information Request. If you submit information you claim should be entitled to treatment as confidential business information, you may comment on the above-mentioned possible disclosure within fourteen days of receiving this Information Request.

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DEFINITIONS AND INFORMATION WIDEFIELD PCE PLUME, SSID#08-SQ REQUEST #1

The following terms and definitions shall apply to this information request.

- 1. The following terms have the same definition as contained in CERCLA:
 - a. "Facility" Section 101(9);
 - b. "Hazardous substance" Section 101(14) (including any mixture of hazardous substances with other substances, including petroleum products);
 - c. "Person" Section 101(21) (including an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body);
 - d. "Pollutant or contaminant" Section 101(33) (including any mixture of hazardous substances with other substances, including petroleum products); and
 - e. "Release" Section 101(22) (includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant).
- 2. "Arrangement" means every separate contract or other agreement between two or more "persons," as "person" is defined above.
- 3. The terms "document" and "documents" mean any written, digital, recorded or visually or aurally reproduced material in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts and all non-identical copies.
- 4. The term "hazardous waste" has the same definition as that contained in Section 1004(5) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.
- 5. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
- 6. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), and the substance or the subject matter.
- 7. The term "identify" means, with respect to a natural person, to provide the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

- 8. "Materials" means all liquid or solid chemical substances (excluding manufactured retail goods) that have been generated, treated, stored or disposed of, or otherwise handled at or transported to the Property, including, but not limited to, all hazardous substances, pollutants or contaminants, hazardous wastes and solid wastes, as defined above, and mercury.
- 9. "Property" means the properties Guardian Life Insurance Company of America acquired on or about June 6, 1986, from Charles Golding Jr. (Tax Assessor Schedule No. 6435320020) that is referred to as the Mission Trace Shopping Center, located at 3205 South Academy Boulevard, Colorado Springs, Colorado.
- 10. "You" or "Guardian Life Insurance Company of America" shall mean Guardian Life Insurance Company of America

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. § 9601, et seq., or regulations found at 40 C.F.R. Part 300, et seq., in which case the statutory or regulatory definitions shall apply.

Rest of Page Intentionally Left Blank

QUESTIONS AND REQUESTS FOR DOCUMENTS WIDEFIELD PCE PLUME, CO, SSID# 08-SQ REQUEST #1

- 1. Please identify the person or persons answering these Questions.
- 2. For each and every Question, identify all persons you consulted in preparing an answer.
- 3. For every Question, identify any documents you consulted or referred to in preparing your answer or that contain information responsive to the Question; and, please provide an accurate copy of all such documents.
- 4. Describe all interests that you currently have or previously had at the Property, including the following information. To the extent the information requested below is provided in deeds or other documents submitted with your response to this Request, you need not include the information in your narrative response.
 - a. Provide the legal description of properties owned;
 - b. Describe the nature of the interest you own(ed), (i.e. surface, mineral, surface and mineral, fractional ownership, fee title, leasehold, option to buy);
 - c. Identify the entity from which you acquired the interest, and the date you acquired it;
 - d. If you have sold or in any manner transferred all or a portion of the Property, identify the person to whom you sold or transferred the property, describe the property sold or transferred, and provide the date of the sale or transfer;
 - e. If you own or owned a fractional interest in the Property, describe what portion you own or owned and identify the other owners of the Property;
 - f. Please provide copies of all deeds or other conveying instruments by which you acquired or transferred title to the Property.
- 5. If you leased all or any portion of the property, provide copies of all lease agreements.
- 6. Describe the nature of your operations/business activities and other arrangements on the Property, both past and present.
- 7. At the time you acquired any portion of the Property, did you know or have reason to know that any hazardous substance was generated, transported, stored, treated, or disposed of at the Property? Describe all investigations of the Property that you or any other party undertook prior to your acquisition of any portion of the Property and all of the facts on which you base the answer to this question.
- 8. Describe the acts or omissions of any person, including your employees or agents and including those persons with whom you have or have had a contractual relationship or other arrangement, who may have caused a release or threat of release of hazardous substances (including but not limited to Tetrachloroethylene (PCE)) at or near the Property.

- 9. Identify all persons, including your employees, who have knowledge, information or documents about the generation, use, purchase, treatment, storage, disposal, or other handling of materials (excluding manufactured retail goods) at, or transportation of materials to, the Property.
- 10. State each and every name, other than El Paso County Retirement Plan, under which El Paso County Retirement Plan or El Paso County Retirement Plan's owners did business on the Property in question.
- Describe and, where available, provide maps and/or construction drawings that describe the physical characteristics of the Property including that portion of the Property leased and/or operated by Kings One Hour Cleaners or any other dry cleaners, including, but not limited to, the following:
 - a. Surface structures (e.g., buildings, tanks, etc.);
 - b. Groundwater wells, including drilling logs;
 - c. Underground storage tanks and associated piping;
 - d. Past and present drainage system(s), sanitary sewer system(s), tank(s); and,
 - e. The nature and location of any piping or tanks associated with facility operations.
- 12. Describe any and all additions, demolitions, or changes of any kind to physical structures on, under, or about that portion of the Property leased and/or operated by Kings One Hour Cleaners (e.g., excavation work, tank removal, etc.). Please state the dates on which such changes occurred and who performed them.
- 13. Provide all technical or analytical information in your possession or control relating to soil, water (ground or surface), geology, geohydrology on and about the Property.
- 14. Describe all leaks, spills or releases, or threats of releases of any hazardous substances, pollutants, or contaminants that have occurred or may occur at or from the Property, including, but not limited to:
 - a. When such releases occurred or may occur;
 - b. How the releases occurred or may occur;
 - c. What materials were released or may be released? (Include the common name, the chemical name, grade, and chemical composition of the substance. If the substance is known to include impurities or manufacturing contaminants, include these also);
 - d. What amount of each such hazardous material was released;
 - e. Where such releases occurred or may occur;
 - f. All activities taken in response to each release or threatened release.
 - g. All investigations of the circumstances, nature, extent or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken; and

- h. All persons with information relating to items a. through g., above.
- 15. If any release or threatened release identified in response to the above question occurred into any subsurface disposal system or floor drain inside or under any buildings located on the Property, further identify:
 - a. Where precisely the disposal system or floor drains are, and/or were, located;
 - b. When the disposal system or floor drains were installed and/or removed;
 - c. Whether the disposal system or floor drains were connected to pipes, and if so, the purpose of such pipes;
 - d. Where such pipes are or were located;
 - e. When such pipes were installed; and
 - f. How and when such pipes were replaced, repaired, or otherwise changed.
- 16. For each and every above-ground or underground storage tank known to have been on the Property:
 - a. Identify the date of installation of the tank at the Property;
 - b. Describe the size and capacity of the tank;
 - c. If the tank is underground, indicate the depth at which it was installed;
 - d. Describe materials that have been stored in the tank, and the dates during which those materials were stored in that tank;
 - e. Describe any spills or leaks that have occurred in connection with the operation of the tank, including date of spill or leak, material spilled or leaked, amount of material spilled or leaked, cause of spill or leak, efforts made to contain and clean up any material spilled or leaked, and any reports filed with any state, local or federal agency regarding any spill or leak.;
 - f. Identify all tests that have been conducted on the integrity of the tank and any pipes connected to it, and provide copies of all reports prepared showing the results of those tests; and
 - g. Identify the date of removal of any tank that has been removed from the Property, and who removed it.
- 17. Describe any visible contamination or other indications of contamination anywhere on the Property at the time you acquired any portion of the Property.
- 18. Describe any information related to contamination on the Property that was known to you at the time that you purchased any portion of the Property.

End of Enclosure 1

STATE OF COLORADO

Bill Ritter, Jr., Governor

Martha E. Rudolph, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Denver, Colorado 80246-1530 Phone (303) 692-2000 TDD Line (303) 691-7700 Laboratory Services Division 8100 Lowry Blvd. Denver, Colorado 80230-6928 (303)-692-3090

Located in Glendale, Colorado http://www.cdphe.state.co.us Colorado Department of Public Health and Environment

July 29, 2010

Certified Mail # 7005 1820 0000 3210 7293 Return Receipt Requested

Mr. Jung Sin Kim King's One Hour Cleaners 3217 S. Academy Blvd. Colorado Springs, CO 80916

RE: COMPLIANCE ORDER AND ASSESSMENT OF ADMINISTRATIVE PENALTY ORDER NUMBER 10-07-29-01

Dear Mr. Kim,

You are hereby served with the enclosed Compliance Order Number and Assessment of Administrative Penalty {Order Number 10-07-29-01} by the Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the "Department") pursuant to section 25-15-308, C.R.S.

This Order is issued, jointly and severally, to you and to JSK Cleaners, Inc. d/b/a King's One Hour Cleaner and Laundromat ("King's One Hour Cleaner") (collectively "the Parties") based upon findings by the Department that the Parties have violated the Colorado Hazardous Waste Act, sections 25-15-301 through 316, C.R.S. (the "Act") and the Colorado Hazardous Waste Regulations at 6 CCR 1007-3 (the "Regulations") as more particularly described in the enclosed Compliance Order.

You are hereby notified that the enclosed Compliance Order becomes effective immediately upon receipt. If you wish to appeal this Compliance Order, please submit a written request within thirty (30) calendar days of receipt of this Order in accordance with the provisions of 25-15-308(3)(a), C.R.S. Upon such written request, a hearing will be scheduled in accordance with section 24-4-105, C.R.S., and the obligation to submit payment of any monetary penalty pursuant to the Order shall be stayed pending the results of the hearing and any subsequent judicial review. The filing of an appeal does not negate the Parties' obligation to otherwise comply with the Order.

EXHIBIT

EPA #COD981541436
MR. Kim
King's One Hour Cleaners
July 29, 2010
Cover Letter – page 2

If the Parties do not contest the findings and assessments set out in the Order, payment of the penalty for the violations may be forwarded to the Colorado Department of Public Health and Environment. Payment must be made within thirty (30) days of the effective date of this Order by certified or cashier's check drawn to the order of the "Colorado Department of Public Health and Environment" and delivered to the attention of Mr. Randy Perila of the Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment located at 4300 Cherry Creek Drive South, Denver, Colorado 80246-1530.

Should you desire to schedule a hearing, or have any questions regarding this Compliance Order, please contact me at (303) 692-3307. If you have retained legal counsel, he or she may contact Robert Eber of the Colorado Attorney General's Office at (303) 866-5034 to discuss legal aspects of this case.

I urge you to give this matter your immediate attention.

Sincerely,

Kathryn Stewart, Unit Leader

Hazardous Waste Compliance Assurance Unit

Hazardous Materials and Waste

Management Division

Enclosure: Compliance Order No. 10-07-29-01

cc w/ enclosure;

Robert J. Eber, Office of the Attorney General Beth Ann Williams, HMWMD



COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

COMPLIANCE ORDER AND ASSESSMENT OF ADMINISTRATIVE PENALTY ORDER NUMBER 10-07-29-01

IN THE MATTER OF JSK CLEANERS, INC. d/b/a KING'S ONE HOUR CLEANER AND LAUNDROMAT and MR. JUNG SIN KIM

This Compliance Order is issued, jointly and severally, to JSK Cleaners, Inc. d/b/a King's One Hour Cleaner and Laundromat ("King's One Hour Cleaner") and Mr. Jung Sin Kim ("Mr. Kim") (collectively "the Parties") by the Colorado Department of Public Health and Environment, the Hazardous Materials and Waste Management Division ("the Department"), pursuant to the Department's authority under section 25-15-308(2), C.R.S., of the Colorado Hazardous Waste Act, sections 25-15-101 to 515, C.R.S. (the "Act"). The Department, as set forth herein, has determined that the Parties have violated, or are in violation of, certain provisions of the Act and the Colorado Hazardous Waste Regulations (the "Regulations"), 6 CCR 1007-3, and are hereby ordered to come into compliance with the Act and the Regulations.

General Findings of Fact and Conclusions of Law

- 1. At all times relevant to the violations cited herein, JSK Cleaners, Inc. was a Colorado corporation in good standing and registered to conduct business in the State of Colorado. Colorado Secretary of State Business Center records list the formation date of the corporation as August 31, 2000 and September 6, 2000 as the effective date of the trade name. JSK Cleaners, Inc. is an "operator" of King's One Hour Cleaner, as that term is defined by 6 CCR 1007-3, section 260.10.
- 2. Mr. Kim is the President of JSK Cleaners, Inc., and is an "operator" of King's One Hour Cleaner, as that term is defined by 6 CCR 1007-3, section 260.10. Mr. Kim routinely makes environmental compliance decisions on behalf of King's One Hour Cleaner and the Facility.
- 3. JSK Cleaners, Inc. and Mr. Kim are "persons" under the Act and the Regulations (section 25-15-101(13), C.R.S.; 6 CCR 1007-3, section 260.10).

- 4. At all times relevant to the violations cited herein, the Parties operated the King's One Hour Cleaner dry cleaning facility located in the Mission Trace Shopping Center at 3217 S. Academy Boulevard in Colorado Springs, Colorado (the "Facility"). The Parties' dry cleaning operations at the Facility include the use of the dry cleaning solvent perchloroethylene (a/k/a "tetrachloroethylene" and also referred to as "PCE" or "perc"). Dry cleaning operations have been conducted at this facility location since 1986. The Parties commenced operations at the Facility in 2000 and have continuously operated since that date.
- On or about September 2, 1986, King's One Hour Cleaner submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) to the Department stating that its operations included the generation of F002 listed hazardous waste at the Facility. King's One Hour Cleaner was issued the EPA identification number COD981541436. Subsequent notifications for the Facility were filed with the Department on or about May 10, 1991, July 14, 2006, and October 21, 2009. King's One Hour Cleaner is currently listed as a conditionally exempt small quantity generator (generates less than 100 kg per month) of hazardous waste at the Facility.
- 6. The Parties generate the following hazardous wastes from dry cleaning operations at the Facility:
 - Spent filters from the dry cleaning machine contaminated with spent PCE (F002);
 - PCE sludge from the distillation of spent PCE (F002);
 - Separator water contaminated with PCE (F002); and
 - Lint contaminated with PCE (F002).
- 7. The Parties do not have and have never had a permit or interim status for the treatment, storage, or disposal of hazardous waste at the Facility.
- 8. On August 26, 2009, the Division conducted an unannounced inspection, pursuant to the Division's authority under section 25-15-301(3), C.R.S., at the Facility for the purpose of determining compliance with the Act and the Regulations. The inspection was conducted to investigate possible mismanagement of hazardous waste at the Facility, following the discovery of PCE in a down-gradient municipal well.
- 9. At the time of the August 26, 2009, Division inspectors observed PCE staining on the wall above the hazardous waste storage drum located near the dry cleaning machine, and on the floor at the base of the hazardous waste storage drum located in the back of the Facility. A Compliance Advisory was issued to King's One Hour Cleaner at the time of inspection for failure to maintain and operate a facility in a manner that minimizes the possibility of a release, in violation of 6 CCR 1007-3, section 261.5(b)(5).
- 10. On or about August 27, 2009, the Division received a copy of a September 23, 2005

 Phase I Environmental Site Assessment Report prepared by EBI Consulting regarding the

- Mission Trace Shopping Center. Results of the environmental investigation indicated the presence of PCE in the soil in the vicinity of the Facility.
- 11. On September 9, 2009, the Division received an e-mail from Mr. Kim in response to the August 26, 2009 Compliance Advisory. The September 9, 2009 e-mail did not contain a written response, but rather contained pictures taken after cleaning of the PCE-stained areas at the Facility in response to the August 2009 Compliance Advisory.
- 12. On October 14, 2009, the Division conducted a random compliance evaluation inspection at the Facility, pursuant to the Environmental Results Program, to determine compliance with the Act and the Regulations. The Division inspector noticed that the PCE staining observed at the time of the August 26, 2009 inspection had been scrubbed clean.
- 13. At the time of the October 14, 2009 inspection, Mr. Kim indicated that he disposes of the separator water generated at the Facility by emptying the buckets of separator water onto the pavement of the front parking lot of the Facility. A second Compliance Advisory was issued to King's One Hour Cleaners at the time of the October 14, 2009 inspection. In the October 14, 2009 Compliance Advisory, King's One Hour Cleaners was instructed to ensure the facility is operated and maintained in a manner that minimizes the possibility of an unplanned release, and to ensure that separator water is disposed as an F002 hazardous waste.
- 14. In his signed written response to the October 14, 2009 Compliance Advisory statement, Mr. Kim confirmed that the Facility had been disposing of its separator water by throwing it out into the front parking lot at the Facility. Mr. Kim indicated that the Facility had recently purchased an evaporator unit and was now evaporating its separator water.
- 15. On December 9, 2009, the Division held a Compliance Conference by teleconference with Mr. Kim to discuss the August 26, 2009 and October 14, 2009 Compliance Advisories.
- 16. On February 2, 2010, the Division issued a draft Compliance Order on Consent to the Parties for violations noted at the Facility at the time of the August 26, 2009 and October 14, 2009 inspections. The mutual objectives of the Compliance Order on Consent were to:
 - a. establish compliance requirements and criteria for the continued operation of the Facility:

?

- b. establish requirements and schedules for the investigation into the nature and extent of any hazardous waste or hazardous constituent contamination at, or relating to, the hazardous waste management facility located at the Facility;
- c. establish requirements and schedules for the remediation, if necessary, of any contamination at, or relating to, the Facility; and

- d. resolve the violations of the Act and the Regulations cited in the Compliance Advisories issued to King's One Hour Cleaner by the Division on August 26, 2009 and October 14, 2009.
- 17. On March 25, 2010, the Division held a settlement conference with the Parties regarding the draft Consent Order that was issued to the Parties on February 2, 2010.
- 18. Efforts to reach a negotiated settlement with the Parties have been unsuccessful, and the Division is now issuing the Compliance Order as a Unilateral Order to the Parties, jointly and severally.
- 19. Corrective action for remediation of the PCE contamination at the Facility is currently being conducted by New Mission LLC, the property owner.

<u>Violation</u> (Illegal Disposal of Hazardous Waste)

20. Paragraphs 1 through 19 of this Compliance Order are incorporated herein by reference.

Findings of Fact

- 21. At the time of the October 14, 2009 inspection, Mr. Kim indicated that he disposes of the Facility's separator water by emptying the buckets of separator water onto the pavement of the front parking lot of the Facility.
- 22. In his signed written response to the October 14, 2009 Compliance Advisory, Mr. Kim confirmed that the Facility had been disposing of its separator water by throwing it out into the front parking lot at the Facility.

Conclusions of Law

- 23. Pursuant to 6 CCR 1007-3, section 261.2(a), a solid waste is any discarded material that is not otherwise excluded from regulation. A discarded material is any material which is abandoned by being disposed of, burned or incinerated, or accumulated, stored or treated before or in lieu of being abandoned by being disposed of, burned or incinerated.
- 24. The spent PCE wastes generated by the Parties from dry cleaning operations at the Facility are solid wastes as defined by 6 CCR 1007-3, section 261.2.
- 25. Pursuant to 6 CCR 1007-3, section 261.3(a), a solid waste is a hazardous waste if the waste has no commercial use or value and it exhibits any characteristic of hazardous waste or it has been listed as a hazardous waste.

- 26. Pursuant to 6 CCR 1007-3, section 261.31, spent halogenated solvents, including spent PCE, are listed as hazardous waste (F002).
- 27. The spent PCE wastes generated by the Parties from dry cleaning operations at the Facility are F002 listed hazardous waste.
- 28. 6 CCR 1007-3, section 260.10 defines disposal of a hazardous waste as the discharge, deposit, injection, dumping, spilling, leaking or placing of any solid waste or hazardous waste into or on any land or water so that such solid or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
- 29. Pursuant to section 25-15-308(1)(b), C.R.S. and 6 CCR 1007-3, Part 100, no person shall dispose of any hazardous waste on-site without having obtained either state or federal interim status, a federal permit, or a permit issued by the Department.
- 30. The Parties have disposed of F002 hazardous waste into the environment at the Facility without having a permit or interim status, in violation of section 25-15-308(1)(b), C.R.S. and 6 CCR 1007-3, section 100.10.

COMPLIANCE ORDER

Based on the foregoing factual and legal determinations and pursuant to section 25-15-308(2), C.R.S., the Parties, jointly and severally, are hereby ordered to:

- 31. Upon the effective date of this Consent Order, make hazardous waste determinations for all solid waste streams generated at the Facility, in compliance with 6 CCR 1007-3, section 262.11.
- 32. Upon the effective date of this Consent Order, ensure that all hazardous wastes generated at the Facility are managed in accordance with the Act and the Regulations. Specifically, King's One Hour Cleaners and Mr. Kim shall ensure that all hazardous waste generated at the Facility is either treated in an on-site facility or delivered to a permitted hazardous waste treatment, storage or disposal facility, in compliance with 6 CCR 1007-3, sections 261.5(g)(3) and 100.10, and section 25-15-308(1)(b), C.R.S. King's One Hour Cleaner is currently evaporating the facility's separator water in an on-site misting unit.
- 33. The Department reserves the right to impose any additional conditions or requirements necessary for compliance with the Act or the Regulations or to protect human health and the environment.

NOTICE OF LIABILITY FOR ADMINISTRATIVE PENALTIES

34. Section 25-15-309, C.R.S. provides that any person who violates Section 25-15-308, C.R.S., which includes violations of Part 3 of the Act, Sections 25-15-301 to 327, C.R.S., and the Colorado Hazardous Waste Regulations 6 CCR 1007-3, or any Compliance Order of the Department of Health which is not subject to a stay pending judicial review, shall be subject to a administrative penalty of not more than \$15,000 per violation per day during which such violation occurs. Based upon the facts described in this Order, and taking into account the factors prescribed by statute, i.e., the seriousness of violations and any good faith efforts to comply with applicable statutory and regulatory requirements, the Department assesses an administrative penalty of \$15,000.00 for the violation in this Order as follows:

Violation	Assessed Penalty
1. Illegal Disposal of Hazardous Waste	\$15,000.00
Administrative Penalty Total:	\$15,000.00

This penalty was calculated in accordance with the Department's Penalty Policy. The reasoning behind this penalty is detailed in the penalty calculation worksheets for this case, which are incorporated herein by reference and enclosed as Attachment 1.

TERMS OF PENALTY PAYMENT

- 35. If the Parties do not contest the findings and assessments set out above, payment of the penalty for the violations may be forwarded to the Colorado Department of Public Health and Environment. Payment must be made, within thirty (30) days of the effective date of this Order, by certified or cashier's check drawn to the order of the "Colorado Department of Public Health and Environment" and delivered to the attention of Mr. Randy Perila of the Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment located at 4300 Cherry Creek Drive South, Denver, Colorado 80246-1530.
- 36. Payment of the penalty in this manner does not relieve the Parties of their obligation to perform the activities required in this Compliance Order.

NOTICE OF EFFECTIVE DATE OF ORDER

37. This Compliance Order is effective immediately upon receipt.

OPPORTUNITY TO APPEAL

38. Pursuant to section 25-15-308(3), C.R.S., the Parties have the right to file an appeal within thirty (30) calendar days of receipt of this Compliance Order. The Notice of appeal shall be filed by personal service or by registered mail, return receipt requested, with the Office of Administrative Courts in the Department of Personnel, and with the Executive Director of the Department or the Executive Director's designee. The filing of an appeal of this Compliance Order shall stay the obligation to submit payment of any monetary penalty pursuant to this Compliance Order. The filing of an appeal does not, however, negate the Parties' obligation to otherwise comply with the Order. Should you have any questions regarding this Compliance Order, you may contact:

Kathryn Stewart, Unit Leader
Hazardous Waste Compliance Assurance Unit
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
HMWMD-CP-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530
Telephone: (303) 692-3307

Questions of a legal nature shall be directed to:

Robert Eber, Senior Assistant Attorney General Office of the Attorney General Natural Resources and Environment Section Attorney for the Division 1525 Sherman Street, 5th Floor Denver, Colorado 80203 Telephone: (303) 866-5034

FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT:

<u>7/24/2010</u>

Katheyn Stewart, Unit Leader

Hazardous Waste Compliance Assurance Unit

Hazardous Materials and Waste

Management Division

t Division

Approved as to Form:

Robert Eber # 16840*

Senior Assistant Attorney General

Office of the Attorney General

Natural Resources and Environment Section

Attorney for the Division

1525 Sherman Street, 5th Floor

Denver, Colorado 80203

Telephone: (303) 866-5034

*Counsel of Record

7/30/10 Date

EPA #COD981541436 ATTACHMENT 1 TO COMPLIANCE ORDER NUMBER 10-07-29-01

Facility Name: King's One Hour Cleaners EPA ID Number: COD981541436 PENALTY COMPUTATION WORKSHEET SUMMARY DATE: July 21, 2010

isposal of hazardous v	waste on-site, at 3217 South Acade	my Blvd, Colorado Springs,
lation Violated: 6 Co	CR 1007-3, sections 261.5(g)(3) ar	d 100.10 and section 25-15-
	•	•

EPA #COD981541436 AMETACHMENT 1 TO COMPLIANCE ORDER NUMBER 10-07-29-01

Facility Name: King's One Hour Cleaners PENALTY COMPUTATION WORKSHEET SUMMARY OF ECONOMIC BENEFIT Date July 21, 2010

Date July 21, 2010	
Economic Benefit Calculation Number 1	
TOTAL CALCULATION FOR ECONOMIC BENEFIT	\$0

ATTACHMENT 1 TO COMPLIANCE ORDER NUMBER 10-07-29-01

CONSIDERATION OF STATUTORY FACTORS

The factors to be considered in determining an appropriate penalty in accordance with the provisions of 25-15-309(3) C.R.S. are incorporated into this penalty calculation to the extent that information is available. The factors are incorporated as follows:

- Factor A. The seriousness of the violation. This factor is incorporated as the 'Seriousness of the Violation' in each calculation.
- Factor B. Whether the violation was intentional, reckless, or negligent. This factor is incorporated as an adjustment for intent, recklessness, and/or negligence in each calculation.
- Factor C. The impact upon or the threat to the public health or the environment as a result of the violation. This factor is incorporated as the 'Impact or Threat' in each calculation.
- Factor D. The degree of recalcitrance or recidivism upon the part of the violator. This factor is incorporated as an adjustment for history of non-compliance in each calculation.
- Factor E. The economic benefit realized by the violator as a result of the violation. This factor is incorporated as an adjustment for economic benefit of non-compliance in each calculation.
- Factor F. The voluntary and complete disclosure by the violator of a violation in a timely fashion after discovery and prior to the Department's knowledge of the violation provided that all reports required pursuant to the state environmental law have been submitted as and when otherwise required. The violations in this case were not voluntarily disclosed and, therefore, no mitigation of the penulty was considered for this factor.
- Factor G. Full and prompt cooperation by the violator following disclosure of a violation. The violations in this case were not voluntarily disclosed and, therefore, no mitigation of the penalty was considered for this factor.
- Factor H. The existence of a regularized and comprehensive environmental compliance program or an environmental audit program that was adopted in a timely and good faith manner and that includes sufficient measures to identify and prevent future noncompliance. At the time of the violations, King's One Hour Cleaners did not have a comprehensive environmental compliance program. The nature of the violations is evidence that such a compliance program was not in place at the Facilities. No mitigation of the penalty is warranted due to the implementation of a management system.
- Factor I. Any other aggravating or mitigating circumstances. This factor may be incorporated as an adjustment in each calculation.

ANTACHMENT 1 TO COMPLIANCE ORDER NUMBER 10-07-29-01

PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER 1:

Company Name: King's One Hour Cleaners

EPA ID Number: COD981541436

Regulation Violated: 6 CCR 1007-3, sections 261.5(g)(3) and 100.10 and section 25-15-308(1)(b) C.R.S., disposal of hazardous waste at 3217 South Academy Blvd, Colorado Springs, CO, without having interim status or a permit.

interim status or a permit.

Date of Inspection: October 14, 2009 Lead Inspector: Beth Ann Williams

PART I - SERIOUSNESS OF VIOLATION

1. Default: Major-Major

2. Seriousness of the Violation: (Statutory Factor A)

Justification: During a random environmental results program (ERP) compliance evaluation inspection on October 14, 2009 Mr. Jung Sin Kim indicated that he disposes of his tetrachloroethylene (PCE)-contaminated separator water by emptying full buckets onto the pavement of the front parking lot of his facility. One of the key elements of the hazardous waste regulatory program is to prohibit the disposal of hazardous waste at facilities that do not have interim status or a permit for such disposal. Permits establish the technical and administrative controls that are necessary to ensure protection of human health and the environment and are a key regulatory requirement in the overall cradle to grave waste management program. Tetrachloroethylene -contaminated separator water is an F002 Listed hazardous waste. Therefore, this violation of unpermitted disposal of hazardous waste represents a Major deviation from the regulatory requirements.

Major

3. Impact or Threat: (Statutory Factor C) Major

Justification: Based upon information contained in the above referenced inspection, hazardous waste containing tetrachloroethylene has been released into the environment at King's One Hour Cleaners located at 3217 South Academy Blvd, Colorado Springs, CO. Tetrachloroethylene is reasonably anticipated to be a human carcinogen and has been discovered at levels above drinking water standards in groundwater monitoring wells associated with a plume originating from the facility's location. Because releases have been admitted and confirmed the impact or threat to human health and the environment for this violation has been assessed as Major.

- 4. Base Penalty from Penalty Matrix: \$25,000
- 5. Number of Counts: 1

Justification: The Division has assessed 1 count to this violation because the operator was out of compliance with one regulatory requirement at one facility, 3217 South Academy Blvd, Colorado Springs, CO.

6. Total Per-Count Penalty: \$25,000

AMFACHMENT 1 TO COMPLIANCE ORDER NUMBER 10-07-29-01

PART II - PENALTY ADJUSTMENTS

1. Intentional and/or Reckless: (Statutory Factor B) 0%

Justification: An adjustment for this factor is not warranted because the Facility's actions did not appear to be intentional and/or reckless.

2. Degree of Recalcitrance or Recidivism: (Statutory Factor D) 0%

Justification: An adjustment for this factor is not warranted because the Facility does not appear to have a history of noncompliance.

3. Voluntary and complete disclosure of violation by the violator prior to the Departments knowledge of the violation: (Statutory Factor F) 0%

Justification: An adjustment for this factor is not warranted because the Facility did not voluntarily disclose the violation in question.

4. Full and prompt cooperation by the violator after disclosure of a violation: (Statutory Factor G) 0%

Justification: An adjustment for this factor is not warranted because the Facility did not voluntarily disclose the violation in question.

5. The existence of a comprehensive environmental compliance program: (Statutory Factor H)

Justification: An adjustment for this factor is not warranted because the Facility does not have an environmental management compliance program that includes sufficient measures to identify and prevent future non-compliance.

6. Other aggravating or mitigating circumstances: (Statutory Factor I) 0%

Justification: An adjustment for this factor is not warranted.

7. Total Adjustments: \$0

8. Adjusted Per-Day Penalty: \$25,000

9. Number of Days of Violation: 1 Day Applied

Justification: One day of violation has been applied because the Department is unable to determine the number of times the disposal occurred.

10. Multi-day Penalty: 1 day of violation x \$25,000 per day = \$25,000

11. Economic Benefit: (Statutory Factor E) \$0

AYSTACHMENT 1 TO COMPLIANCE ORDER NUMBER 10-07-29-01

Justification: The Division has evaluated the potential for economic benefit associated with this violation. Disposal of hazardous waste is normally a violation for which an economic benefit can be calculated. However, in this case, the Division does not have information to determine the volume of hazardous waste that was released to the environment. Therefore, an economic benefit for this violation cannot be determined.

12. Total Penalty Amount: \$25,000

The Colorado Revised Statute limits the Division's ability to assess administrative penalties to no more than \$15,000 per day per violation. Therefore, the maximum penalty that may be assessed for this violation is \$15,000.